14.0 MODIFIED REDESIGN ALTERNATIVE (MRA)

14.1 Introduction

As a result of circulation of the Draft EIR for the Malibu Parks Public Access Enhancement Plan—Public Works Plan, the Conservancy/MRCA received a number of written and oral comments on the Draft EIR and the Public Works Plan (PWP), asking that the project be reduced in scope, relocated to an off-site location, or that greater attempts be made to avoid and/or reduce the potential environmental impacts associated with the Proposed Plan.

In response to both oral and written comments received, the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority ("Conservancy/MRCA") have revised one of the alternatives detailed in Section 8.0 of the DEIR to create the Modified Redesign Alternative ("MRA"). In developing this MRA, the Conservancy/MRCA worked to refine the Redesign Alternative contained in the DEIR in an effort to reduce all significant and unavoidable impacts to a level of insignificance, and achieve all of the goals, policies, and objectives of the proposed Plan. The MRA was also shaped to further reduce those impacts deemed insignificant (with or without mitigation) in the DEIR but which were of concern to the public.

The intent was to make use of the comments received, and the analysis contained in the DEIR, to develop an alternative which was environmentally superior to the Proposed Plan analyzed in the DEIR. This section of the FEIR describes the MRA, summarizes the major design features/changes which distinguish it from the Proposed Plan, and identifies the environmental impacts which would be associated with the implementation and operation of the MRA. It also compares those impacts to those described in the DEIR for the Proposed Plan and identifies the mitigation measures which apply to the MRA. The mitigation identified for the MRA mirrors that which is contained in the DEIR for the Proposed Plan. In some cases non-substantive changes have been made to the wording of a mitigation measure in response to comments or because of numerical difference between the number of facilities included in the MRA and Proposed Plan. In addition, some mitigation measures contained in the DEIR would not be required for the MRA due to a reduction in impacts under the MRA; therefore the analysis indicates those measures included in the DEIR which are not applicable to the MRA. No new mitigation measures are required for the MRA.

14.2 The Modified Redesign Alternative

This section provides a summary overview of the Modified Redesign Alternative; a detailed description of the Modified Redesign Alternative (MRA) is located in *Appendix*

MRA-1 of Volume IV of the Final EIR. Figures MRA-1 through MRA-19c within *Appendix MRA-2* serve to illustrate and provide an overview of the MRA. Detailed concept-level civil plans (preliminary grading & drainage plans) for the MRA are located within *Appendix MRA-3*. A Public Works Plan for the MRA has been prepared and is included in *Appendix MRA-4*. In addition, A Fire Protection Plan (FPP), which reflects the additional fire safety-related features of the MRA is provided in *Appendix MRA-5*. Figures VIS-1a through VIS-10b are located within *Appendix MRA-6* and provide visual simulations of the Modified Redesign Alternative

Modified Redesign Alternative Overview

The Proposed Plan includes campsites at five parks: Corral Canyon Park, Conservancy Malibu Bluffs Property, Ramirez Canyon Park, Latigo Trailhead, and Escondido Canyon Park. To reduce operational costs and move in the direction of clustering camping locations, the DEIR Redesign Alternative concentrated the bulk of the proposed campsites into one PCH-adjacent cluster at Corral Canyon Park and into two clusters on the Conservancy's Malibu Bluffs Property. However, the Redesign Alternative retained a few campsites at Ramirez Canyon Park, Latigo Trailhead, and Escondido Canyon Park.

The MRA furthers the clustering of camping areas by eliminating all camping in Escondido Canyon Park and Latigo Trailhead, but retaining two of the reservation-only accessible campsites in Ramirez Canyon Park that are included in the Redesign Alternative. The MRA includes 54 campsites compared to the 71 in the Proposed Plan. However, the MRA includes a higher percentage of large sized campsites so there is a nominal difference in the number of campers that can be accommodated on a given night between the MRA and the Proposed Plan.

To maintain and enhance proposed public recreational benefits at Ramirez Canyon Park, Latigo Trailhead, and the upstream camping area in Corral Canyon Park (Camp Area 2), most of the campsites included in the Proposed Plan and the Redesign Alternative, but deleted from the MRA are replaced with day use/picnic areas at these three parks in the MRA.

The most substantive refinement of the Redesign Alternative in the MRA is the total elimination of all proposed improvements to Escondido Canyon Park with the exception of trail construction. The MRA removes the proposed parking lot, restrooms and all associated facilities near the terminus of East Winding Way. The only improvement in the MRA proposed in the Escondido Canyon watershed is to complete two segments of the Coastal Slope Trail between Murphy Way and Latigo Trailhead.

There would be no major differences in the segments of the Coastal Slope Trail, Beach to Backbone Trail, and Beach to Bluffs Trail between the Proposed Plan, Redesign Alternative and the MRA.

The following Tables provide information on the key components of the MRA, as compared to the Proposed Plan and the other alternatives:

- Table 14.2-1 identifies the number of campsites at each Park facility
- Table 14.2-2 identified the number of proposed new parking spaces at each Park facility
- Table 14.2-3 identifies the number of day use areas at each Park facility.
- Table 14.2-4 identifies the number of restrooms and restroom stalls at each Park facility

Table 14.2-1
Proposed Plan vs. Alternatives
Number of Campsites Comparison on a Per Park Basis

Camp Area	Ramirez		Escondido			Latigo	Corral		Malibu Bluffs					*Total*
	1	*2*	*1*	*2*	*3*	*1*	*1*	*2*	*1*	*2*	*3*	*4*	*5*	
PROPOSED PLAN														
Small Type 1	-	3	-	2	3	4	9	5	3	6	-	12	3	*50*
Small Type 2	-	-	3	-	4	-	-	-	-	-	-	-	-	*7*
Large	2	-	-	-	1	1	2	-	-	-	4	-	-	*10*
Tent Cabin	-	-	-	-	-	-	-	-	4	-	-	-	-	*4*
Sub-Total per Area	***5***		***13***			***5***	***16***		***32***					**71**
2002 LCP ALTERNATIVE														
Small Type 1	-	-	-	-	-	-	3	-	3	6	-	12	-	*24*
Small Type 2	1	-	3	1	-	-	-	-	-	-	-	-	-	*5*
Large	-	-	-	-	-	-	8	-	-	4	4	-	-	*16*
Tent Cabin	-	-	-	-	-	-	-	-	4	-	-	-	-	*4*
Sub-Total per Area	***1***		***4***			***0***	***11***		***33***					**49**
REDESIGN ALTERNATIVE														
Small Type 1	-	-	-	-	-	2	3	-	3	6	-	12	-	*26*
Small Type 2	1	-	3	1	-	-	-	-	-	-	-	-	-	*5*
Large	2	-	-	-	-	1	8	-	-	4	4	-	-	*19*
Tent Cabin	-	-	-	-	-	-	-	-	4	-	-	-	-	*4*
Sub-Total per Area	***3***		***4***			***3***	***11***		***33***					**54**
MODIFIED REDESIGN ALTERNATIVE														
Small Type 1	-	-	-	-	-	-	5	-	4	6	-	5	-	20
Small Type 2	2	-	-	-	-	-	-	-	-	-	-	-	-	2
Large	-	-	-	-	-	-	12	-	6	5	5	4	-	32
Sub-Total per Area	**2**		**0**			**0**	**17**		**35**					**54**

NOTE: At Ramirez Canyon Park, for the Modified Redesign Alternative, two accessible campsites would be implemented on Phase 2. Zero new campsites would be implemented in Phase 1.

Table 14.2-2
Proposed Plan vs. Alternatives
Comparison of New Parking Spaces Provided

	Parking Quantities (Number of New Spaces)					
Park Name	**Ramirez**	**Escondido**	**Latigo**	**Corral**	**Malibu Bluffs**	***Subtotal***
Proposed Plan	36	17	9	20	52	***134***
2002 LCP Alternative	27	17	2	20	30	***96***
Redesign Alternative	37	17	2	20	30	***106***
Modified Redesign Alternative	24	0	4	19	36	***83***

NOTE: The total number of parking spaces would equal new plus 68 existing.

NOTE: This table indicates new parking spaces that are physically constructed on the ground. In some cases, the new spaces reconfigure existing parking spaces, and cause a reduction in existing parking spaces. The NET new number of parking spaces is not shown on this table. At Ramirez Canyon Park and Corral Canyon Park, when the new spaces are constructed, they would reconfigure and delete some existing spaces.

NOTE: At Ramirez Canyon Park, for Modified Redesign Alternative, there would be 0 new spaces within the park boundaries in Phase 1 and 10 new spaces within the park boundaries in Phase 2. (The additional 14 spaces would be located along Kanan Dume Road and would be constructed in Phase 1.)

NOTE: At Escondido Canyon Park (Proposed Plan, 2002 LCP Alternative, and Redesign Alternative), there would be 16 new public spaces, as shown on Table 8.2 of the DEIR. This Table also includes the one camp host space.

NOTE: At Corral Canyon Park (Proposed Plan, 2002 LCP Alternative, and Redesign Alternative), two accessible spaces would be created by restriping one accessible space and two standard spaces. There would be 21 new spaces when counting the two accessible spaces, as shown on Table 8.2 of the DEIR. This table only counts the one new accessible space.

Table 14.2-3
Proposed Plan vs. Alternatives
Comparison of Day Use Areas Provided

	Number of New Day Use Areas					
Park Name	**Ramirez**	**Escondido**	**Latigo**	**Corral**	**Malibu Bluffs**	***Subtotal***
Proposed Plan	3	0	0	0	1	***4***
2002 LCP Alternative	7	0	2	1	1	***11***
Redesign Alternative	6	0	2	1	1	***10***
Modified Redesign Alternative	**6**	**0**	**4**	**1**	**1**	***12***

NOTE: At Ramirez Canyon Park, for Modified Redesign, in Phase 1, there would be 7 day use areas (non-accessible). In Phase 2, there would be 6 day use areas (of which, three would be improved and would be accessible).

Table 14.2-4
Proposed Plan vs. Alternatives
Comparison of Number of Restrooms and Restroom Stalls

	Number of New Restrooms and (Number of New Restroom Stalls)					
Park Name	**Ramirez**	**Escondido**	**Latigo**	**Corral**	**Malibu Bluffs**	***Subtotal***
Proposed Plan	2 (3)	3 (4)	1 (1)	3 (3)	7 (9)	***16 (20)***
2002 LCP Alternative	0 (0)	2 (3)	0 (0)	2 (2)	7 (10)	***11 (15)***
Redesign Alternative	2 (3)	2 (3)	1 (1)	2 (2)	7 (10)	***14 (19)***
Modified Redesign Alternative	**2 (3)**	**0 (0)**	**1 (1)**	**2 (4)**	**8 (11)**	***13 (19)***

NOTE: At Ramirez there is an existing single stall restroom which would be replaced with a double restroom, under the Proposed Plan, Redesign Alternative or Phase 1 of the Modified Redesign Alternative. Only the net increase in stalls and restrooms is reflected in the figures for Ramirez. At Ramirez, the numbers reflect an additional two new single restrooms under the Proposed Plan, the Redesign Alternative and MRA- Phase 2, plus the increase in one stall from the replacement of the single stall portable restroom with a double restroom.
Note: There is currently one existing single stall restroom at Corral Canyon Park, which is not included in the number of new restrooms and stalls.
Note: Existing restrooms in the existing buildings at Ramirez are also not included on the table.

Comments Incorporated in the MRA

In developing the MRA, the intent was to make use of the comments received, and the analysis contained in the DEIR, to refine an alternative to be both environmentally superior to the Proposed Plan analyzed in the DEIR, and to achieve all of the goals, policies, and objectives of the Proposed Plan. This section highlights key changes between the Proposed Plan, the DEIR Redesign Alternative and the MRA. The section also describes how the MRA refines details of the project design, development and operational elements.

Relocation and Clustering of Campsites

The main proposed camp area in Escondido Canyon Park was eliminated in the Modified Redesign Alternative because DEIR comments brought to light a deed restriction on that specific parcel that prohibits camping. The Redesign Alternative retained a cluster of campsites and ADA standard accessible trails around the proposed 17-space Escondido Canyon parking lot on a parcel not affected by the deed restriction. The MRA eliminates all camping at Escondido Canyon Park, including the one campsite in Camp Area 2 in the Redesign Alternative, which is also affected by the deed restriction.

The remaining campsites clustered around the proposed parking lot in the Redesign Alternative were removed from the MRA for two reasons. First, the operational costs of meeting the many proposed requirements for camping in the Plan Area for the three remaining campsites did not represent an efficient use of maintenance resources. Second, the three campsites in the Redesign Alternative were proposed on sloped terrain that required retaining walls and more grading than is recommended in the LCP. The grading and retaining walls necessary for an ADA compliant camping facility in this location was not consistent with LCPA overlay policy to confine camping to more level areas.

The MRA's relocation of all the Proposed Plan's campsites in the proposed upstream camping area (Camp Area 2) in Corral Canyon to the PCH adjacent bluff area (Camp Area 1), addresses DEIR commenters' concerns about adequate camper supervision and fire evacuation. This also eliminates any restroom maintenance issues associated with Camp Area 2.

Reduction in Parking

The MRA includes less parking than the Proposed Plan. The MRA includes a total of 157 parking spaces (83 new). The Proposed Plan includes a total of 202 parking spaces (134 new). The MRA's reduction in total parking spaces responds to comments on water

quality concerns and total project disturbance footprint. The MRA also specifies that permeable materials would be utilized for parking spaces wherever feasible and consistent with site-specific geotechnical recommendations.

The parking lot in the Proposed Plan at Latigo Trailhead was moved and substantially reduced in size in the MRA to reflect hazardous geologic conditions and to eliminate impacts to Environmentally Sensitive Habitat Areas (ESHA).

The proposed 17-space Escondido Canyon Park parking, included in the Proposed Plan and the Redesign Alternative, is entirely eliminated in the MRA. Elimination of this parking lot reduces both the total project disturbance footprint and grading volume.

In Ramirez Canyon, the total amount of available parking for the Proposed Plan would be 74 spaces (48 in Ramirez Canyon Park and 26 along Kanan Dume Road). The total amount of available parking for the MRA would be 68 spaces in Phase 1 and 62 space in Phase 2 (14 spaces in both cases along Kanan Dume Road). The reduced parking area along Kanan Dume Road would further avoid ESHA impacts.

Cook Stations (Hospitality Stations)

In response to fire concerns with respect to the use of open-flame cooking and lighting devices within camp areas, whereas the Proposed Plan and Redesign Alternative allowed open-flame cook-stoves and lanterns, the MRA would provide an all-weather electrical outlet at each fire-proof cook station (intended for small electrical cooking appliances) and mandate the use of flame-less cook-stoves and lanterns within camp areas. Concerns with respect to dropped cooking appliances/ lanterns and accidental fires associated with matches and lighters would be adequately addressed with this solution.

Camp Hosts and/or Park Administration/ Employee Quarters

To address identified concerns that adequate patrolling and supervision occur at the proposed camp areas 24 hours a day when camping is permitted, the MRA would provide permanent structures both to station, and to provide over-night accommodations for, MRCA rangers and/or wildland fire-trained specialists at the two primary camping sites—Corral Canyon Park and Malibu Bluffs Conservancy Property.

One such permanent structure replaces the RV camp hosts site at Corral Canyon Park included in both the Proposed Plan and the Redesign Alternative. At Malibu Bluffs Conservancy Property, the MRA retains two RV camp host sites and adds two permanent structures in the northwest corner of the property close to PCH.

In the Proposed Plan, camping would be allowed via drop boxes or onsite registration with a camp host or employee. In the MRA, camping would only be allowed after onsite registration with a camp host/employee, during which the campers would be informed of the "cold-camping" regulation. This change was made in order to address some commenters' concerns about adequate around-the-clock staff presence.

An additional element added to the MRA is that all Camp Host will be designated and trained as public officers designated pursuant to the MRCA Park Ordinance as authorized by the Public Resources Code and would be able to strictly enforce all policies. As public officers, such Camp Hosts have the power of arrest and shall enforce all applicable misdemeanors or infractions, including the "cold-camping" provisions cited within the PWP, pursuant to the MRCA Ordinance and other provisions of state law or applicable ordinances. MRCA park rangers are already sworn California Peace Officers and can arrest for felony as well as misdemeanor and infraction violations. By expanding the number of persons authorized to enforce the MRCA Park Ordinance by the power of arrest the MRA further puts teeth into the supervision of campsites and further reduces the likelihood of rule violations.

Vegetation/ Fuel Modification Buffers

In response to the LACFD comment letter, MRCA/Conservancy staff communicated with LACFD by email, phone, and in person to better understand the fire department's comments and to ensure that, as necessary, that the MRA adhere to LACFD's recommendations. The vegetation/fuel modification buffer dimensions were adjusted for the MRA to be more consistent with LACFD recommendations. The most significant change was that the MRA includes 200 feet of clearance around proposed fire shelters compared to 100 feet in the Proposed Plan. The result is more fuel modification area required by the MRA, some of which is in ESHA.

Emergency Fire Shelters

Similarly, in response to receipt of the LACFD comment letter, consistent with LACFD recommendations, the optional emergency fire shelters in the MRA have been relocated from the parking areas (as identified within the Proposed Plan) to those camping areas not in close proximity to roadways. In areas where the optional emergency fire shelters were identified by LACFD as being extraneous, the shelters were removed from the plans. The MRA Project Description identifies that, with the exception of Ramirez Canyon Park, all emergency fire shelters are considered optional and would only be installed if required and approved by the Coastal Commission and responsible fire agency. Not including the proposed shelter-in-place upgrades to existing buildings at

Ramirez Canyon Park, the Proposed Plan includes nine fire shelters; the MRA includes seven fire shelters.

Ramirez Canyon Park Building Retrofits

Comments from both LACFD and the public address the retrofitting of buildings in Ramirez Canyon Park for fire safety. The MRA and the MRA Fire Protection Plan (FPP) more completely address design specifications of the California Building Code, Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure to better assist the reader in identifying the types of building changes that could possibly be required should the responsible fire agency require modifications to existing buildings at Ramirez Canyon Park. The detailed description of the MRA contained in Appendix MRA-1, provides details on anticipated modifications. In addition, the MRA, all buildings at Ramirez Canyon Park will be retrofitted with interior sprinkler systems.

Water Supply

In response to receipt of the Los Angeles County Water Works District No. 29 (the District) comment letter, MRCA communicated with the District by email, phone, and in person to better understand the District's comments and to ensure that, as necessary, that the MRA adhere to the District's recommendations. With respect to water service, whereas the Proposed Plans were more conceptual in nature, the MRA includes more specific design information with respect to water service connections for Corral Canyon Park and Conservancy Malibu Bluffs Property. These changes also address comments from LACFD.

Ramirez Canyon Park Small Group Gatherings/ Tours

To address concerns related to traffic associated with the use of Ramirez Canyon Park (Peach House and Barn facility) for small group gatherings and tours, the maximum allowed participants was revised downward in the MRA from 60 participants to 40 participants each. The Art Deco facility would also be limited to being a place used solely to greet guests or as a component of site tours, but not as a primary site for group functions. While the number of small events is similar in the MRA (Phase 2) compared with the Proposed Plan, the MRA (Phase 1) is limited to continuation of existing small events (e.g., public outreach, meetings, etc.) two days/week (maximum 40 participants with an additional 20 staff on-site) and Conservancy/MRCA employee training and workshops (twice per month; maximum 60 people).

Ramirez Canyon Park Large Events

To address concerns related to traffic associated with the use of Ramirez Canyon Park for large events, the maximum number of allowed large events under the Proposed Plan of 32 events per year was reduced by 50 percent to 16 large events per years under the MRA. In addition, those large events would only occur in "Phase 2" of the proposed Ramirez Canyon Park improvements, when a secondary emergency access road, Via Acero, would be improved, if that road is required by the responsible fire agency. The MRA also requires that additional vehicles be provided onsite so that there would be enough vehicular capacity to relocate all persons on site for any event in one trip out.

Ramirez Creek Restoration/Enhancement

The Draft EIR baseline condition of Ramirez Creek included a number of non-permitted existing streambed modifications in Ramirez Canyon Park, which were installed over the years (prior to Conservancy ownership). The MRA Final EIR Project Description contained in *Appendix MRA-1* identifies that these previous impacts to riparian habitats (occurring after implementation of the Coastal Act) within Ramirez Canyon Park would be subject to a habitat restoration plan to restore those riparian areas. The Ramirez Creek Restoration/Enhancement Plan is included in the Proposed Plan, all DEIR Alternatives, and in the MRA. (See *Appendix MRA-11*) It would occur as part of Phase 1 of the MRA.

Ramirez Canyon Road and Delaplane Road Widening

In response to receipt of the LACFD comment letter, MRCA communicated with LACFD by email, phone, and in person to better understand the fire department's comments and to ensure that, as necessary, that the MRA adhere to LACFD's recommendations. The Proposed Plan and the Redesign Alternative included the widening of the existing access road and removal of encroachments in the road easements, as necessary, to provide 20-ft clearance for emergency ingress/egress in the canyon along Delaplane Road and Ramirez Canyon Road. In addition, the MRA provides for additional widening to a total road width of approximately 26 feet, for a length of approximately 50 feet adjacent to all existing fire hydrant locations. This additional widening would occur in order to maintain adequate room for operations during an emergency incident along Ramirez Canyon Road and/or Delaplane Road, if required by the responsible fire agency,

Park Public Outreach Programs

The Proposed Plan contemplated programs/events at Escondido Canyon Park, Corral Canyon Park, and Malibu Bluffs, allowing for one (1) 50-person bus which could arrive at each designated Park site on weekdays and approximately three (3) 50-person buses could arrive at each designated Park site on weekends. In response to community concerns with respect to hosting multiple areas of public assembly in a very high fire hazard zone, no specific programs/ events are proposed at Escondido Canyon Park, Corral Canyon Park, and Malibu Bluffs under the MRA.

Public Works Plan

Subsequent to release of the DEIR, the Draft Public Works Plan (Plan), contained in *Appendix C* of the Draft EIR, has undergone a number of non-substantive revisions in response to additional editorial review and to incorporate a number of comments and suggestions on the draft Plan provided by Coastal Commission Staff. In addition, the Plan was revised to reflect the MRA (see *Appendix MRA-4*) and status of the local hearings and community involvement associated with the Plan, and to incorporate responses to comments received on the Draft EIR and mitigation measures included herein.

Revisions made to the Plan for the MRA are summarized as follows:

Chapter 1. Plan revisions consist of minor editorial text changes only.

Chapter 2. Plan revisions consist of only minor editorial text changes and clarifications in Sections 2.0-2.4. Section 2.5, Environmental Review, and Section 2.6, Local Hearings and Community Involvement, include more significant revisions intended to update the sections' information to reflect the current status of environmental review, local hearings and community involvement associated with the Plan.

Chapter 3. Plan revisions were completed to incorporate mitigation measures identified in the Final EIR as implementation measures, where appropriate, and to include requirements which bind policy and implementation measure compliance with Public Works Plan Notice of Impending Development (NOID) procedures, where applicable. In addition, the following Chapter 3 text changes were completed in response to formatting and organizational comments and suggestions provided by Coastal Commission Staff:

- The Chapter title was changed to Public Access and Recreation Facilities Plan so its clear this chapter will function as the facilities plan for the proposed improvements and uses.

- Where possible, any duplication of policies and implementation measures between Chapter 3 sections has been eliminated and replaced with cross-references to applicable policies and implementation measures between sections.
- Narrative text within Sections 3.1-3.4 has been moved to the front of each section such that the policies and implementation measures of each section are easy to locate and identify within the Plan.
- The project description narrative text and level of detail included in Section 3.5, Public Works Plan Scope of Improvements, has been scaled-back and a Malibu Parks Public Access Enhancement Plan-Public Works Plan Facility Improvements Summary Table and a Trail Improvements Summary Table has been added. These tables summarize all proposed facility improvements included in the Plan and include references to applicable project plans. All project description information in this section has been revised to reflect current project plans.

The Policy Consistency Analysis, previously contained in **Chapter 4** of the Plan, has been revised to reflect the current project description and is now included in the Plan as Appendix B.

Chapter 4. Previously included as Chapter 5 of the Plan, Chapter 4 now includes the procedural requirements of the Plan and the Chapter title has been changed to Public Works Plan Procedures. Revisions to this chapter consist only of formatting and organizational changes as recommended by Coastal Commission Staff and include deleting specific procedures related to Coastal Commission review and processing requirements for NOID submittals, exclusions from NOID procedures, and emergency authorizations. Detailed discussion of these sections has been replaced with appropriate references to applicable California Coastal Commission Regulations and the regulations have been included in the Plan as Appendix B.

Figures. Revisions for the Plan figures were made in response to comments on the DEIR and included the following changes:

- Figures 2 and 3 have been revised to reflect all current parkland/parcel ownership, proposed park and trail location information.
- Figure 8 (previously Figure 7) includes a trail map series that has been updated per current project plans.

Comparison of the Modified Redesign Alternative and the Proposed Plan

The Proposed Plan includes a total of 71 campsites spread amongst five park locations. The MRA includes 54 campsites at three park locations. In the MRA, Corral Canyon Park would contain 17 campsites, Malibu Bluffs Conservancy Property 35 campsites, and Ramirez Canyon Park 2 campsites. The two proposed campsites at Ramirez Canyon Park in the MRA would be specialized ADA accessible sites available by reservation only. Under the MRA, the construction of these two camping sites can only occur after an emergency access road is constructed on Via Acero to link Ramirez Canyon Road to Kanan Dume Road, if that road is required by the responsible fire agency.

In the Proposed Plan, the Redesign Alternative, and the MRA, both the Corral Canyon Park and Conservancy Malibu Bluffs Property camp areas include numerous ADA accessible campsites. In the Proposed Plan, a total of four day-use picnic areas are proposed. In the MRA, 12 day-use areas are proposed, as a result of the conversion of some of the proposed campsites to day-use sites.

In the Proposed Plan, a total of 20 new restroom stalls are proposed; in the MRA, 19 new restroom stalls are proposed. (See Table 14.2-4. These numbers do not include restrooms in buildings at Ramirez Canyon Park.

The MRA includes a total of 157 parking spaces (including 68 existing and 83 new spaces). The proposed Plan would include a total of 202 parking spaces (including 68 existing and 134 new spaces).

Ramirez Canyon Park

Improvements at Ramirez Canyon Park would be phased under the MRA as described below. The Proposed Plan was not phased. As with the Proposed Plan, under both Phase 1 and Phase 2 of the MRA the total daily round trips to Ramirez Canyon Park would be limited to 40 round trips.

Phase 1 – Under the MRA, the existing uses (e.g., administrative offices, ranger/maintenance supervisor residence, maintenance, etc.), would continue, similar to under the Proposed Plan. In MRA Phase 1 the ranger/maintenance supervisor residence would be retrofitted as a fire safety shelter, and all other buildings would have interior sprinklers installed, and hydrants would be installed. Construction of a secondary access road (if required by the appropriate fire agency) from Kanan Dume Road to Ramirez Canyon Park (through an extension and widening of Via Acero) would occur under Phase 2.

Phase 2 - During Phase 2, additional events above and beyond those permitted in Phase 1 and additional public facilities would be allowed under the MRA. Under the MRA Phase 2, large events (maximum 200 participants plus staff and employees of service providers) would be limited to 16 events per year, whereas the Proposed Plan would allow 32 events per year.

The Proposed Plan and the MRA (Phase 2) are similar in that they both include public outreach 7 days/week (maximum 40 participants) and 12 tours/small gatherings/week (maximum 40 participants). The MRA (Phase 1) differs from the Proposed Plan in that it limits the small events to continuation of existing small events (e.g., public outreach, meetings, etc.) two days/week (maximum 40 participants with an additional 20 staff on-site). Conservancy/ MRCA employee training and workshops (twice per month) would also be permitted.

Under the MRA two accessible campsites, parking improvements, improvements to day use areas to make them accessible, and associated restrooms would be constructed in Phase 2. In contrast, the Proposed Plan includes 5 campsites at Ramirez.

The MRA (Phase 2) and the Proposed Plan include 10 new spaces for a total of 48 parking spaces (existing plus proposed) within Ramirez Canyon Park boundaries. The MRA (Phase 1) does not include parking improvements; the existing 54 parking spaces within the park boundary would remain.

The Proposed Plan includes 26 new parking spaces, while the MRA (Phase 1) includes 14 new parking spaces, in three parking areas along Kanan Dume Road. The MRA includes the new feature of utilizing permeable surfaces for new parking areas, where feasible.

The Proposed Plan includes three accessible day use areas at Ramirez Canyon Park. In contrast, the MRA would included seven non-accessible day use areas during Phase 1. During Phase 2, under the MRA, one of these day use areas would be converted into one of the two camping sites planned for Ramirez Canyon Park under the MRA, and three of the day use sites would be made accessible.

The Proposed Plan includes two new single stall restrooms plus the replacement of the existing portable restroom (by the back meadow in the northerly portion of the park) with a permanent double stall restroom. In the MRA, those improvements are split between Phase 1 and Phase 2. Phase 1 includes the replacement of the existing portable restroom with a permanent double stall restroom, while Phase 2 includes two new single stall restrooms.

Both the MRA Plan (Phase 2) and Proposed Plan include Via Acero secondary emergency access improvements. In the MRA, changes were made to the conceptual design plans for Via Acero to address LACFD comments (e.g., making it less steep), compared with the Proposed Plan.

The Proposed Plan includes a fire shelter at Ramirez Canyon Park. For the MRA, in lieu of this fire shelter, two buildings at Ramirez Canyon Park would be retrofitted for use as a last resort shelter-in-place.

A new feature in the MRA is the inclusion of striping and turn lanes along Kanan Dume Road, in response to comments from Los Angeles County Department of Public Works (LACDPW).

Escondido Canyon Park

The Proposed Plan includes 13 campsites (in three camp areas) and a 17-space parking lot with a broad range of facilities including an accessible trail leading from the new parking area to the creek, and four restroom stalls. The MRA only includes trail improvements to connect the proposed Coastal Slope Trail from Murphy Way to Latigo Trailhead. No other project elements included in the Proposed Plan, such as camping or parking, are included in the MRA at Escondido Canyon Park.

Latigo Trailhead

The MRA deletes all camping at Latigo Trailhead and reduces the number of parking spaces from nine spaces to four spaces compared with the Proposed Plan. The MRA retains a single stall restroom, picnic day use areas and a new fire hydrant at this location.

Corral Canyon Park

The MRA includes 17 campsites at Camp Area 1 in Corral Canyon Park. The Proposed Plan consists of 11 campsites in Camp Area 1 plus five campsites in Camp Area 2 for a total of 16 campsites. The MRA deletes camping at Camp Area 2 by Corral Canyon Creek and replaces it with a day-use picnic area. The MRA clusters all campsites onto the bluff overlooking the Pacific Ocean (Camp Area 1). Camp Area 1 would have better access for restroom servicing, facilitate easier oversight/management, result in lower operational costs, and maximize the effectiveness of fire protection and relocation efforts.

Waterlines, pumps, and hydrants were added to the MRA in response to comments from LACFD and LACDPW and to provide redundancy to the water supply system.

In the MRA, a permanent structure is proposed for the camp host and/or park administration/employee quarters building. The Proposed Plan includes just a trailer site for the camp host. The MRA includes a total of 34 parking spaces (21 of those being new). As shown in Table 14.2-2, the Proposed Plan includes a total of 33 parking spaces (20 of those being new).

Malibu Bluffs Conservancy Property

The Proposed Plan includes 32 campsites in five camp areas on the Conservancy's Malibu Bluffs Property. The MRA includes 35 campsites in four camp areas. In the MRA, Camp Area 5 was deleted and the campsites in Camp Area 4 were moved northward to respond to concerns from commenters about their proximity to Malibu Road.

The Proposed Plan includes 52 parking spaces in four parking areas (parking areas 1, 2, 3, and 4). The MRA includes 40 parking spaces in two parking areas (parking areas 1 and 3). Parking Area 2 along PCH was eliminated from the MRA because road access to Parking Area 2 via either of the two proposed vehicle bridges, or a separate driveway from PCH, could not be accomplished without impacts to Environmentally Sensitive Habitat Areas. Parking Area 3 along PCH was rotated (compared with the Proposed Plan) to reduce its visibility from PCH and to adjust fuel modification impacts. In the MRA, Parking Area 4 along Malibu Road was converted into a two-stall restroom because of space constraints that make it difficult to fit both a restroom and a meaningful amount of parking. Adequate parking exists along Malibu Road and a restroom provides the greater public benefit.

Proposed main waterlines along PCH were modified in the MRA (in comparison to the Proposed Plan) in response to comments from LACFD and Los Angeles County Waterworks and to increase flow capacity.

14.3 Comparison of the Environmental Impacts of the MRA vs. the Proposed Plan

3.1 Aesthetics / Visual Resources

3.1.1 Setting

The setting for this alternative section is similar to that which was identified within Section 5.1, *Aesthetic/ Visual Resources*, contained within the Draft EIR. However, to assist the reader with understanding the Modified Redesign Alternative's visual effect upon Malibu Bluffs, one additional photo location was added, as depicted in the revised photo index; Figure 5.1-1e is contained in *Appendix MRA-6*.

3.1.2 Impact Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section are the same as that which was identified with Section 5.1, *Aesthetic/ Visual Resources*, contained within the Draft EIR.

Project Impacts

The Modified Redesign Alternative would result in an approximate 24% reduction in camp sites and a 22% reduction in total parking spaces. This reduction would also include a corresponding decrease in the number of restroom facilities at the parks. The reduction in proposed camping sites, parking spaces, and restroom facilities would result in less grading and altering of the natural environment. As a result of a reduction in park facilities, potential impacts on visual resources would be reduced when compared to the Proposed Plan.

Figures VIS-1 through VIS-10 (see *Appendix MRA-6*) provide existing photos and visual simulations of the Modified Redesign Alternative at each park area.

Ramirez Canyon Park

Under the Modified Redesign Alternative, the primary change from the Proposed Plan would be the reduction in the number of campsites and public outreach programs. The number of campsites would be reduced from 5 campsites to 2 campsites. Three campsites proposed in the meadow would be eliminated, while the two larger campsites located at the tennis court would be replaced with 2 smaller campsites. Improvements at Ramirez Canyon Park (RCP) would be phased under this Alternative. Under Phase 1,

existing RCP structures will be retrofitted for ignition resistance/ember protection, if required, and fitted with interior fire sprinklers. Two of these structures, Ranger/Maintenance Supervisor residence (Phase 1) and Peach House (Phase 2) have been identified as on-site fire shelters for last resort refuge (for more detail, see *Appendix MRA-5*) and will be retrofitted to California Building Code, Chapter 7A standards for ignition resistance, including roofs, vents, exterior walls, windows, doors, and appendages, amongst others. Construction of a secondary access road (if required by the appropriate fire agency) from Kanan Dume Road to Ramirez Canyon Park (through an extension and widening of Via Acero) would occur under Phase 2, including the bridge replacement over Ramirez Canyon Creek to safely support 75,000 pound fire apparatus. However, with the exception of the extension of Via Acero for secondary access, these changes would not increase the footprint or vegetation removal as contemplated under the Proposed Plan. The extension of Via Acero would result in a 20 ft wide secondary access road to RCP to meet minimum grade and width requirements, which would be marginally greater than what was contemplated under the Proposed Plan. However, similar to the Proposed Plan, this access road is not highly visible from public viewing areas, and therefore, would not alter existing public views or damage scenic vistas.

In addition, the proposed "optional" fire shelter located along Murphy Way would not obstruct public views to and from these roadways. The optional fire shelter proposed along Murphy Way is situated near the terminus of Murphy Way and site topography naturally screens this shelter from public viewing areas of any scenic designated roadway or vista.

Figure VIS-1a provides a photo of an existing view of Ramirez Canyon Park from Kanan Dune Road, while Figure VIS-1b provides the same view with a visual simulation of the proposed re-aligned Trail 1a. As illustrated in the visual simulation, the re-aligned trail would not significantly alter existing public views or damage scenic vistas.

Figure VIS-2a provides a photo of an existing view of Kanan Dume Road above Ramirez Canyon Park, while Figure VIS-2b provides the same view with a visual simulation of the proposed re-aligned Trail 1a. As illustrated in the visual simulation, the re-aligned trail would not significantly alter existing public views or damage scenic vistas in this area.

Figure VIS-3a provides a photo of an existing view of the proposed secondary access road along Via Acero, while Figure VIS-3b provides the same view with a visual simulation of the proposed secondary access. As illustrated in the visual simulation, the roadway is not highly visible and would not alter existing public views or damage scenic vistas.

The proposed Ramirez Canyon Park improvements under the Modified Redesign Alternative would be guided by the Public Works Plan that would provide for critical planning, design, and siting of the park improvements to minimize potential visual impacts from public viewpoints. Consequently, the overall impact level of the Modified Redesign Alternative on the visual character, visual resources, and scenic vistas in the area from implementation of the proposed improvements at Ramirez Canyon Park and Kanan Dume parking area would be considered *less than significant,* similar to the proposed Plan, although to a somewhat reduced degree due to the overall decrease in park and recreation improvements.

Escondido Canyon Park

Under the *Modified Redesign Alternative,* the primary change from the Proposed Plan is the elimination of all 13 campsites, restrooms, water tank, optional fire shelter, and parking lot from this park area. As a result, with the exception of trails, no improvements would be visible from Winding Way.

As the Modified Redesign Alternative would have none of the camping restroom or parking facilities that were identified within the Proposed Plan, the overall impact level of the Modified Redesign Alternative on the visual character, visual resources, and scenic vistas in the area from implementation of the proposed improvements at Escondido Canyon Park would be considered *less than significant.* The less than significant impact would be reduced, as compared to the Proposed Plan, due to the elimination of restroom, camping, and parking facilities at this location.

Latigo Trailhead

Under the *Modified Redesign Alternative,* the primary change from the Proposed Plan would be the elimination of all 5 campsites, water tank, and optional fire shelter from this trailhead area. The former campsite areas have been replaced with 4 day-use picnic areas. Figure VIS-4a provides a photo of an existing view of the Latigo Trailhead site, while Figure VIS-4b provides the same view with a visual simulation of the proposed parking area, restroom, and picnic areas. As illustrated in the visual simulation, the proposed improvements are located above and setback from the adjacent Latigo Canyon Road, which is bordered by dense vegetation. The combination of elevation changes and dense vegetation between the proposed improvements and Latigo Canyon Road minimize visibility of the site.

The proposed Latigo Trailhead improvements under the Modified Redesign Alternative would be guided by the Public Works Plan that would provide for critical planning, design, and siting of the park improvements to minimize potential visual impacts from

public viewpoints. Consequently, the overall impact level of the Modified Redesign Alternative on the visual character, visual resources, and scenic vistas in this area from implementation of the proposed improvements at the Latigo Trailhead site would be considered *less than significant.* The less than significant impact would be reduced, as compared to the Proposed Plan, due to the overall decrease in park and recreation improvements.

Corral Canyon Park

Under the *Modified Redesign Alternative,* the primary change from the Proposed Plan is the proposed clustering of camping at Corral Canyon Park within Camp Area 1, the removal of camping at Camp Area 2, and the replacement of a camp host site, with a 600 sf Park Administration/Employee Quarters building at the existing Corral Canyon Trailhead parking lot. Camp Area 1 would increase from 11 campsites to 17 campsites, but would largely be invisible to traffic along PCH due to its location on an elevated terrace behind a local ridge above PCH. The proposed Park Administration/Employee Quarters building and a new two-stall restroom facility would be located primarily behind the existing seafood restaurant, which would generally shield these structures from view along PCH.

Lighting would be provided to the Park Administration/Employee Quarter and Fire Truck storage shed, thus, introducing a new light source at Corral Canyon Park. Electricity installed at the employee quarters would be for lighting, while at the shed it would be for the use of lighting and charging of equipment. The lighting associated with the employee quarters and storage sheds would not be expected to be significant enough to affect existing day or nighttime views in the area. Furthermore, the electrical hook-ups at each campsite cook station would be for the use of electrical hotplates and/or griddles for cooking and would not generate a new light source. Therefore, potential light and glare impacts to light sensitive land uses, such as the surrounding residential neighborhoods in proximity to Corral Canyon Park from implementation of the park improvements would be considered *less than significant.*

A proposed optional fire shelter located along the east shoulder of Corral Canyon Road where proposed Trail 13b meets Corral Canyon Road would be visible from Corral Canyon Road, a city designated scenic road. However, the shelter would not significantly obstruct scenic public views from this roadway due to its relatively small size (approx. 10 sf (l) x 12 sf (w) x 10 sf (h)). Two recently constructed large single family homes are located on the same east side of Corral Canyon Road, just south of the proposed shelter and provide a much larger obstruction to views from Corral

Canyon Road. As a result, the proposed shelter would not result in a significant visual intrusion into the viewshed for travelers along Corral Canyon Road.

Figure VIS-5a provides a photo of an existing view from Corral Canyon Park and Figure VIS-5b provides the same view with a visual simulation of the proposed bluff-top camp improvements, including increased fuel modification buffers. As illustrated in the visual simulation, the proposed 17 camp sites, self-contained restroom, and optional emergency fire shelters would be located "behind" the ridge feature. The high steep slope and small ridge feature provide a natural screen of these campsites, restroom, and optional emergency fire shelters from Pacific Coast Highway. The proposed 10,000 gallon water tank location would not change under this alternative and would remain located below an upper ridge north of the southern camp area as described in the Draft EIR.

The proposed Corral Canyon Park improvements under the Modified Redesign Alternative would be guided by the Public Works Plan that would provide for critical planning, design, and siting of the park improvements to minimize potential visual impacts from public viewpoints. Consequently, the overall impact level of the Modified Redesign Alternative on the visual character, visual resources, and scenic vistas in this area from implementation of the proposed improvements at Corral Canyon Park would be considered *less than significant.* The less than significant impact would be reduced, as compared to the Proposed Plan, due to the overall decrease in the area of park and recreation improvements.

Malibu Bluffs

Under the *Modified Redesign Alternative,* the primary visual change from the Proposed Plan would be the proposed clustering of camping at Malibu Bluffs, reduction in parking areas, introduction of two (2) 600 sf Park Administration/Employee Quarters and a single self-contained restroom, and storage shed/ enclosures. The number of campsites would increase from 32 to 35 campsites, while Parking Areas 2 and 4 would be eliminated. Similar to the Proposed Plan, the concentration of camping at this site would have *less than significant* impacts on visual resources due to the location of improvements setback below an existing vegetated berm that varies in height and extends along a majority of the Bluffs property fronting Pacific Coast Highway.

Figure VIS-6a provides a photo of an existing view from Pacific Coast Highway looking north, while Figure VIS-6b provides the same view with a visual simulation of the proposed improvements at Parking and Camping Area 1, Camping Area 2, and Parking Area 3. As illustrated in this visual simulation, portions of the proposed improvements at Parking and Camping Area 1 (fire truck storage shed, employee quarters and

restroom, storage sheds, water tank), Camping Area 2 (restroom), and Parking Area 3 (restroom, water tank, parking lot) are visible from Pacific Coast Highway. However, the proposed improvements would not substantially obstruct existing public views, particularly blue water views across the site from Pacific Coast Highway.

Figure VIS-7a provides a photo of an existing view of Malibu Bluffs looking south from Pacific Coast Highway. Figure VIS-7b provides the same view with a visual simulation of the proposed improvements at Parking Area 3, Camping Area 3 and Camping Area 4. As illustrated in this visual simulation, portions of these areas are visible from Pacific Coast Highway. However, the proposed improvements are below and setback a substantial distance from Pacific Coast Highway such that blue water views across the site would not be obstructed by the proposed improvements. In addition, the existing vegetated berm that occurs periodically along the property line provides a natural screen of the improvements from most viewponts along Pacific Coast Highway.

Figure VIS-8a provides a photo of an existing view from the City of Malibu's Bluff Park looking west, while Figure VIS-8b provides the same view with a visual simulation of the proposed improvements. As illustrated in this visual simulation, portions of the proposed improvements at Parking and Camping Area 1 (fire truck storage shed, employee quarters and restroom, storage sheds, water tank), Camping Area 2 (restroom), and Camping Area 3 (restroom, optional fire shelter) are visible from the City's Park. However, the proposed improvements are setback mostly below and a substantial distance from the park, such that views across this site would not be obstructed from the City's Park.

Figure VIS-9a provides an additional photo of an existing view from the City of Malibu's Bluff Park looking southwest, while Figure VIS-9b provides the same view with a visual simulation of the proposed improvements at Camping Area 4. As illustrated in this visual simulation, the proposed improvements at Camping Area 4 would be visible from the City's Park. However, the proposed improvements are setback mostly below and a substantial distance from the park, such that views, particularly blue water views across this site would not be obstructed from the City's Park.

Figure VIS-10a provides a photo of an existing view from Malibu Road looking north, while Figure VIS-10b provides the same view with a visual simulation of the proposed improvements at the restroom area. As illustrated in this visual simulation, the proposed improvements at this restroom area would be visible from Malibu Road. Although the restroom facility would be visible from Malibu Road, it would not significantly change the visual character of the area, as views of and across the Malibu Bluffs property would be maintained.

The extension of subterranean electrical lines to the proposed Park Administration/Employee Quarters, and Fire Truck and equipment storage sheds would introduce a new light source at Malibu Bluffs. Electricity installed at the residential quarters would be for lighting, while at the sheds it would be for the use of lighting and charging of equipment. The lighting associated with the employee quarters and storage sheds would not be expected to be significant enough to affect existing day or nighttime views in the area. Furthermore, the electrical hook-ups at each campsite cook station would be for the use of electrical hotplates and/or griddles for cooking and would not generate a new light source. Therefore, potential light and glare impacts to light sensitive land uses, such as the surrounding residential neighborhoods in proximity to Malibu Bluffs from implementation of the park improvements would be considered *less than significant.*

The proposed Malibu Bluff improvements under the Modified Redesign Alternative would be guided by the Public Works Plan that would provide for critical planning, design, and siting of the park improvements to minimize potential visual impacts from public viewpoints. Consequently, the overall impact level of the Modified Redesign Alternative on the visual character, visual resources, and scenic vistas in this area from implementation of the proposed improvements at Malibu Bluffs would be considered *less than significant,* similar to the proposed Plan, although there would be an overall, clustered increase in park and recreation improvements at this park area.

Similar to the Proposed Plan, implementation of park infrastructure along PCH at Malibu Bluffs would have *less than significant* impacts related to the change in visual character, damages to scenic resources, or adverse effect on a scenic vista in the Plan Area.

Mitigation Measures

Implementation of Mitigation Measures **MM VIS-1.1, MM VIS-1.2, MM VIS-1.3, MM VIS-3, and MM VIS-5** contained within the Draft EIR would be recommended in order to further reduce already non-significant aesthetic/ visual impacts associated with the Modified Redesign Alternative related to the implementation of the proposed water tanks, optional emergency fire shelters, storage sheds, and fire truck storage sheds located in the Plan area.

MM VIS-1.1 Restroom facilities, water tanks, optional emergency fire shelters, storage sheds, and fire truck storage sheds shall be designed with colors that are compatible with the surrounding landscape and native, drought tolerant landscape screening shall be used to minimize visibility of the structures.

MM VIS-1.2 To reduce potential impacts on blue-water ocean views from Pacific Coast Highway, Malibu Bluffs Parking Area 3 shall be constructed a minimum 3-feet below road grade of Pacific Coast Highway which would have the effect of "lowering" the height of the water tank and restroom structure. This shall occur within the same footprint of the proposed Malibu Bluffs Parking Area 3. In addition, the proposed restroom and water tank shall be relocated within the Malibu Bluffs Parking Area 3 existing footprint to minimize impacts on blue-water ocean views and visibility from Pacific Coast Highway.

MM VIS-1.3 Stepped or terraced retaining walls with planting in between shall be used to support parking areas, where feasible. Stepped or terraced retaining walls shall not exceed twelve feet in height. If stepped or terraced retaining walls are determined infeasible, a small planter area shall be placed in front of the retaining wall, to allow for planting of shrubs, vines, etc. to visually screen the wall.

Plan Requirement and Timing: Geotechnical, structural, and engineering analyses shall be conducted consistent with this mitigation, and any recommendations resulting there from, shall be prepared and submitted to MRCA for review and approval prior to soil disturbance activity. Applicable recommendations shall be identified on the grading, construction, and restoration plans for each phase.

Monitoring: Prior to grading, MRCA shall review Geotechnical, structural, and engineering analyses and shall review final grading, construction, and restoration plans to ensure consistency with the technical recommendations. MRCA staff shall inspect construction sites during construction to verify compliance with this requirement.

Although impacts from the introduction of new lighting and glare would not be significant, the following mitigation measure is recommended to ensure lighting associated with special events is minimized.

MM VIS-3 Exterior lighting associated with special events shall be minimized and restricted to low intensity fixtures, shielded, and concealed to the maximum extent feasible so that no light source is directly visible from public viewing areas.

Plan Requirement and Timing: Lighting plans shall be prepared and submitted to MRCA for review and approval prior to installation or use.

Monitoring: MRCA shall review and approve lighting plans consistent with this mitigation. MRCA staff shall inspect Plan sites during installation to verify compliance with this requirement.

Implementation of the Plan's visual resources and sign policies and implementation measures, compliance with Chapter 6 of the City's LIP, and incorporation of measures **MM VIS-1.1, MM VIS-1.2, MM VIS-1.3 and MM VIS-5** below would ensure that the design and construction of the Plan's proposed park and trail improvements, in particular the proposed signs, are sited to minimize potential impacts on aesthetic and visual resources in the Plan area to a level of less than significant.

MM VIS-5 A Comprehensive Sign Plan detailing the location, size, design, content, and maintenance of signs shall be prepared.

Plan Requirement and Timing: The Comprehensive Sign Plan shall be prepared and submitted to Coastal Commission staff for review and approval prior to installation of signs.

Monitoring: Prior to installation of signs, MRCA shall review the final Sign Plan to ensure consistency with the plans recommendations. MRCA staff shall inspect signs to verify compliance with this requirement.

Residual Impacts

Given the limited visibility of a majority of the proposed improvements due to their location, the specific project design features, incorporation of the proposed Plan's policies and implementation measures identified in the DEIR; including the Plan's *Tree Protection Plan (see Appendix MRA-10)*, and incorporation of Draft EIR Mitigation Measures **MM VIS-1.1, MM VIS-1.2, MM VIS-1.3**, **MM VIS-3**, and **MM VIS-5**, potential impacts on the change in visual character, damages to scenic resources, or adverse effect on a scenic vista in the Plan Area would be considered ***less than significant (Class III)***.

Analysis of Impacts Post-Mitigation

The general discussion of aesthetic/ visual resource impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.1.3 Cumulative Impacts

The general discussion of cumulative aesthetic/ visual resource impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.1.4 Comparative Analysis

The overall impact level of the Modified Redesign Alternative on aesthetic/ visual resources would be considered *less than significant (Class III)* (similar to the Proposed Plan), due to an overall reduction in park and recreation improvements. ***On balance, the Modified Redesign Alternative would result in slightly reduced impacts on Aesthetics/Visual Resources in comparison to the Proposed Plan.***

3.2 Agricultural Resources

3.2.1 Setting

The setting for this alternative section would not differ from that identified with Section 5.2, *Agricultural Resources*, contained within the Draft EIR.

3.2.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would not differ from that identified with Section 5.2, *Agricultural Resources*, contained within the Draft EIR.

Project Impacts and Mitigation Measures

Under the Modified Redesign Alternative, approximately 76-78% of the improvements under the Proposed Plan would be implemented. There are no agricultural uses on any park lands or within the vicinity, therefore no improvements would occur on or adjacent to any agriculturally productive lands, prime soils, farmland of local or statewide importance or unique farmland. A portion of one of the proposed mitigation sites for the Proposed Plan, the King Gillette Ranch site, does contain soils categorized as Prime under the DOC's FMMP. Because there would be highly similar impacts to biological resources under the Modified Redesign Alternative as compared to the Proposed Plan, and in turn, substantially similar required mitigation acreage, habitat restoration at KGR would be still be required to be implemented at this site for riparian habitat mitigation. Impacts to agricultural resources under the Modified Redesign Alternative would be *less than significant.*

Mitigation Measures

Similar to the Proposed Plan, no mitigation measures would be required.

Residual Impacts

Impacts would remain ***less than significant (Class III).***

Analysis of Impacts Post-Mitigation

The general discussion of agricultural resource impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.2.3 Cumulative Impacts

The general discussion of cumulative agricultural resource impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.2.4 Comparative Analysis

The overall impact level of the Modified Redesign Alternative on agricultural resources would be considered *less than significant (Class III)* (generally similar to the Proposed Plan), given the negligible increase in habitat restoration planned for at King Gillette Ranch and that none of the habitat restoration sites currently support agricultural activities. ***Based upon the discussion above, the Modified Redesign Alternative would have essentially the same impact on Agricultural Resources in comparison to the Proposed Plan.***

3.3 Air Quality

3.3.1 Setting

The setting for this alternative section would be similar to that which was identified within Section 5.3, *Air Quality*, contained within the Draft EIR.

3.3.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would be similar to that identified with Section 5.3, *Air Quality*, contained within the Draft EIR.

Project Impacts

In regards to potential construction emissions, the Modified Redesign Alternative would include improvements similar to the Proposed Plan, but not as extensive as it would develop fewer campsites and parking spaces; as such, construction emissions generated by this Alternative would be reduced relative to the Proposed Plan. It is reasonable to assume that although this Alternative would result in reduced construction emissions in comparison to the proposed Plan, the maximum-worst case scenario that assumes concurrent construction activity at all park sites would result in emissions that would potentially exceed SCAQMD thresholds. Similar to the Proposed Plan, impacts would be *potentially significant.*

Given that the Modified Redesign Alternative would reduce the total amount of campsites (from 71 to 54) and total parking spaces (from 202 to 157 [includes existing and proposed spaces]), resulting in a reduction in associated vehicular trips generated, operational air quality emission impacts generated by the Modified Redesign Alternative would similarly be reduced relative to the proposed Plan. Table 3.3-1 presents the estimated emissions associated with operation of the Plan site under the Modified Redesign Alternative. Maximum daily operational emissions are based on estimated Alternative-generated ADT for the Plan site, which would be 273 trips during the weekdays and 317 trips during the weekend days (based on trip generation rates provided by ATE, 2010). For the purposes of this analysis, the Ramirez Canyon Park Vacant Residential Baseline scenario, which assumes no existing trips at Ramirez Canyon Park, is utilized to represent the maximum daily emissions. See Draft EIR, Section 5.3, *Air Quality*, for a description of the Ramirez Canyon Park baseline scenario.

Table 3.3-1
Estimated Maximum Operational Emissions (lbs/day)[a]
Under the Modified Redesign Alternative

	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Weekday						
Summer	8.88	14.53	127.70	0.15	23.70	4.60
Winter	11.31	17.58	118.19	0.12	23.70	4.60
Weekend						
Summer	9.92	16.34	143.53	0.17	26.63	5.17
Winter	12.69	19.77	132.87	0.14	26.63	5.17
Maximum Daily Scenario						
MAX	**12.69**	**19.77**	**143.53**	**0.17**	**26.63**	**5.17**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	No	No	No	No	No	No
Comparison to Proposed Plan[b]						
Proposed Plan	**20.16**	**32.14**	**220.68**	**0.26**	**41.31**	**7.97**
Modified Redesign Alternative	**12.69**	**19.77**	**143.53**	**0.17**	**26.63**	**5.17**
Comparison[c]	***-7.47***	***-12.37***	***-77.15***	***-0.09***	***-14.68***	***-2.80***

Source: URBEMIS 2007 version 9.2.4. See *Appendix MRA-7* for calculations.
[a] Future traffic for Ramirez Canyon Park is based on total allowable trips (80 total ADT).
[b] Maximum daily scenario emissions
[c] (-) reduced air quality impact; (+) increased air quality impact

As indicated in Table 3.3-1, the Modified Redesign Alternative would not exceed significant thresholds established by the SCAQMD. In comparison to the Proposed Plan estimated operational emissions, this Alternative would result in a decrease in emissions for each criteria pollutant analyzed above. Impacts would be *less than significant*.

Similar to the Proposed Plan, although to a somewhat lesser degree due to the reduced size and scope of the Alternative, impacts to air quality generated during construction of the Modified Redesign Alternative would be *potentially significant for NOx, but not for any other criteria pollutants.*

Mitigation Measures

Mitigation measures **MM AQ-1.1**, **MM AQ-1.2**, **MM AQ-1.3**, and **MM AQ-2** required for the Proposed Plan would also be required under the Modified Redesign Alternative. These mitigation measures are presented below.

Implementation of the following construction phasing mitigation measure would reduce the total combined NO_X construction emissions to below the threshold level.

MM AQ-1.1 To ensure that Plan-generated construction emissions would not exceed the 100 lb/day NO_X threshold, construction of the proposed Plan improvements shall be scheduled such that no more than one Park site or other improvement area could be developed at a single time.

Implementation of Mitigation Measure AQ-1.2 would reduce air pollutant emissions, including NO_X, PM_{10}, and $PM_{2.5}$ resulting from operation of construction equipment.

MM AQ-1.2 The following measure shall be adhered to during Plan grading and construction to reduce NO_X, PM_{10}, and $PM_{2.5}$ and CO emissions from construction equipment:

a. Heavy-duty diesel-powered construction equipment meeting California Air Resources Board/U.S. Environmental Protection Agency Tier 1 standards for off-road equipment or better should be utilized wherever feasible as determined by the Division of the State Architect.

b. The engine size of construction equipment shall be the minimum practical size.

c. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any on time.

d. Construction equipment shall be maintained in tune per the manufacturer's specifications.

e. Catalytic converters shall be installed on gasoline-powered equipment, if feasible as determined by the Division of the State Architect.

f. Diesel-powered equipment should be replaced by electric equipment whenever feasible.

In compliance with Rule 403, construction modeling assumed that the active grading sites would be watered at least 2 times daily. The following mitigation measure is recommended to further reduce PM_{10} and $PM_{2.5}$ emissions and ensure full compliance with SCAQMD Rule 403.

MM AQ-1.3 Consistent with SCAQMD Rule 403, it is recommended that fugitive dust generated by grading and construction activities be kept to a minimum with a goal of retaining dust on the site, by following the dust control measures listed below:

a. During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.

b. During construction, water truck or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas later in the morning and after work is completed for the day and whenever winds exceed 15 miles per hour.

c. Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation.

d. Vehicles speeds on unpaved roads shall be less than 15 miles per hours.

e. All grading and excavation operations shall be ceased when wind speeds exceed 25 miles per hour.

f. Dirt and debris spilled onto paved surfaces at the Plan site and on the adjacent roadways shall be swept, vacuumed, and/ or washed at the end of each workday.

g. All trucks hauling dirt, sand, soil, or other loose material to and from the construction site shall be tarped and maintain a minimum two feet of freeboard.

h. At a minimum, at each vehicle egress from the Plan site to a paved public road, install a pad consisting of washed gravel (minimum-size: one inch) maintained in a clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long (or as otherwise directed by SCAQMD).

i. Review and comply with any additional requirements of SCAQMD Rule 403.

Plan Requirement and Timing: The above measures shall be integrated into the final project construction plans and/or to the Public Works Plan, as applicable, prior to construction activity. Implementation of the measures should be an on-going obligation of the project.

Monitoring: Prior to construction activity, MRCA staff shall review and approve all construction plans to ensure consistency with the above measures. During construction efforts and prior to project sign-off, MRCA staff shall verify implementation of applicable portions of the above measures. During operation of the project, MRCA management shall ensure faithful compliance with applicable portions of the above measures.

Implementation of Mitigation Measure MM AQ-2 would impose a larger separation distance between construction equipment and sensitive receptors to avoid significant ambient air quality impacts.

MM AQ-2 The following measure shall be adhered to during Plan grading and construction to reduce PM_{10} and $PM_{2.5}$ impacts to sensitive receptors from fugitive dust and construction equipment:

a. All construction shall either (1) be prohibited within 50 meters of a sensitive receptor, including but not limited to residential units or (2) heavy-duty diesel-powered construction equipment shall be equipped with a Level 3 diesel particulate filter verified by the California Air Resources Board or U.S. Environmental Protection Agency for the make, model, and model year of the equipment being used.

In addition to MM AQ-2(a), the following mitigation is required at Corral Canyon Park to reduce concentrated PM_{10} and $PM_{2.5}$ emissions resulting from simultaneous construction of trails and park improvements:

b. Concurrent construction of building improvements (i.e., fire truck storage shed, restroom, etc.) and trail improvements within the Corral Canyon South Camp Area, including Corral Camp Parking Area, shall be prohibited.

Plan Requirement and Timing: Mitigation measure AQ-2 shall be integrated into the final project construction plans and/or to the Public Works Plan, as applicable, prior to construction activity. Implementation of the measures should be an on-going obligation of the project.

Monitoring: Prior to construction activity, MRCA staff shall review and approve all construction plans to ensure consistency with the above measures. During construction efforts and prior to project sign-off, MRCA staff shall verify implementation of applicable portions of the above measures. During operation of the project, MRCA management shall ensure faithful compliance with applicable portions of the above measures.

No additional mitigation measures would be required.

Residual Impacts

With implementation of **MM AQ-1.1, MM AQ-1.2**, **MM AQ-1.3**, and **MM AQ-2**, potential impacts to air quality would be ***less than significant (Class II)***.

Analysis of Impacts Post-Mitigation

The general discussion of potential air quality impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.3.3 Cumulative Impacts

The general discussion of cumulative air quality impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.3.4 Comparative Analysis

The overall impact level of the Modified Redesign Project Alternative on air quality would be considered *potentially significant, but mitigable* (*Class II)* (similar to the Proposed Plan), although vehicular-generated air pollutant emissions would be reduced compared to the Proposed Plan as a result of a reduction in campsites and parking. ***Therefore, impacts on air quality would be decreased in comparison to the Proposed Plan.***

3.4 Biological Resources

3.4.1 Setting

The setting for this alternative section would be similar to that which was identified within Section 5.4, *Biological Resources*, contained within the Draft EIR.

3.4.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would be similar to that identified with Section 5.4, *Biological Resources*, contained within the Draft EIR.

Project Impacts

In regards to permanent loss of vegetation communities and land covers, the Modified Redesign Alternative would include improvements similar to the Proposed Plan (Table 3.4-1). While the Modified Redesign Alternative would develop fewer campsite and parking spaces, in response to concerns raised by LACFD, this alternative would result in broader fuel management zones and broader access roads compared to the proposed Plan and wider access roads. The Modified Redesign Alternative would result in permanent impacts to 51.30 acres of vegetation communities and land covers, including 23.17 acres of sensitive vegetation communities (all such communities are also designated Environmentally Sensitive Habitat Area, or ESHA). The proposed Plan would result in permanent impacts to 39.49 acres, including 20.94 acres of sensitive vegetation communities (ESHA). Under the Modified Redesign Alternative, the overall impacts to sensitive vegetation communities (and vegetation communities in general) would be similar to the proposed Plan. Similar to the Proposed Plan, impacts to sensitive vegetation communities would be *potentially significant.*

As shown in Table 3.4-0 below, based on County LUP and City LCP 3:1 mitigation requirements, it is anticipated that the following mitigation acreage will be required for the MRA:

Table 3.4-0
Summary of Mitigation for Impacts to Sensitive Vegetation Communities

Vegetation Community	Total Impacts (Acres)	Mitigation Ratio	Acreage
Sage Scrub and Chaparral			
California Sagebrush Scrub (including disturbed forms)	15.01	3:1	45.03
Chaparral (including disturbed forms)	5.42	3:1	16.26
Subtotal	*20.43*	—	*61.29*
Native Grassland			
Purple Needlegrass Grassland (including disturbed forms)	0.35	3:1	1.05
Giant Wild Rye	0.03	3:1	0.09
Subtotal	*0.38*	—	*1.14*
Riparian and Bottomland Habitats			
Southern Willow Scrub/Red Willow-Arroyo Willow	0.34	3:1	1.02
California Sycamore – Coast Live Oak	0.45	3:1	1.35
Subtotal	*0.79*	—	*2.37*
Total	**21.60**[1]	**---**	**64.80**

[1] This number excludes impacts to 1.57 acres of broad leafed upland tree dominated habitats (i.e, coast live woodland associations and California walnut woodland) because mitigation associated with these sensitive native communities would occur on a tree-by-tree basis at a 10:1 ratio.

As shown in Table 3.4-1 below, the Modified Redesign Alternative would result in a small increase in the effect on non-sensitive vegetation, due primarily to increased effects on California annual grassland, developed and disturbed lands. Effects on non-sensitive communities is not considered an impact under CEQA.

A total of 131 native trees would be directly affected by the Modified Redesign Alternative (compared to 189 native trees which would be directly affected as a result of the Proposed Plan). Up to 13 of the 131 native trees may require removal (compared to 10 for the proposed Plan). The small increase in the number of trees requiring removal is due to site plan changes and modifications to the disturbance limits along Via Acero and Ramirez Canyon Roads. Specifically, of the 10 trees to be potentially removed under the Proposed Plan, 4 will no longer be impacted given their location in areas not subject to disturbance under the MRA. Of the 13 trees to be potentially removed under the MRA, 4 result from alterations to site improvement plans in Ramirez Canyon Park, 1 results from alterations to Ramirez Canyon Road improvement

plans, 2 result from alterations to Via Acero road improvement plans, and the remaining 6 are consistent between the MRA and proposed Plan. A total of 64 native trees would be indirectly affected by the Modified Redesign Alternative due to changes to the local site that affects soil compaction, percolation rates, or hydrological conditions as compared to 180 indirectly affected native tree for the proposed Plan. This Alternative would result in reduced overall impacts to native trees compared to the proposed Plan, although removals would be similar. Similar to the Proposed Plan, impacts to native trees would be *potentially significant.*

Table 3.4-1
Summary of Impacts to Vegetation Community/Land Cover Per the Proposed Project and the Modified Redesigned Alternative

Vegetation Communities	Proposed Project (acres)	Modified Redesign Project Alternative (acres)	Comparison (acres)
Sensitive Vegetation Communities (ESHA)			
California Sagebrush Scrub	8.87	10.99	+2.12
Disturbed California Sagebrush Scrub	3.32	4.02	+0.70
Chaparral	3.71	3.28	-0.43
Disturbed Chaparral	2.14	2.14	0
Native Grassland	0.04	0.04	0
Disturbed Native Grassland	0.00	0.31	+0.31
Giant Wild Rye	0.03	0.03	0
Coast Live Oak	1.20	0.94	-0.26
Disturbed Coast Live Oak	0.08	0.08	0
Coast Live Oak/Toyon-Poison Oak	0.59	0.50	-0.09
California Sycamore-Coast Live Oak	0.85	0.45	-0.40
California Walnut Woodland	0.03	0.03	0
Open Water/Open Channel	0	0.02	+.02
Southern Willow Scrub/Red Willow-Arroyo Willow	0.08	0.34	+0.26
Subtotal for Sensitive Vegetation Communities (ESHA)	***20.94***	***23.17***	***+2.23***
Non-Sensitive Vegetation Communities			
Eucalyptus	0.08	0.10	+0.02
Poison Oak Scrub	0.11	0.11	0

Table 3.4-1
Summary of Impacts to Vegetation Community/Land Cover Per the Proposed Project and the Modified Redesigned Alternative

Vegetation Communities	Proposed Project (acres)	Modified Redesign Project Alternative (acres)	Comparison (acres)
California Annual Grassland	10.30	16.66	+6.36
Developed	4.75	7.14	+2.39
Disturbed Lands	0.69	0.56	-0.13
Ruderal	0.31	0.28	-0.03
Ornamental	0.98	1.32	+0.34
Geraldton Carnation Weed	1.33	1.96	+0.63
Subtotal for Non-Sensitive Vegetation Communities	***18.55***	***28.13***	***+9.58***
TOTAL	**39.49**	**51.30**	**+11.81**

For informational purposes, Tables 3.4-2 through Table 3.4-7 below identify ESHA (sensitive plant community) impact by park and proposed improvements.

Table 3.4-2
Summary of Non-Trail ESHA Impacts at Ramirez Canyon Park under the Modified Redesigned Alternative

Ramirez Canyon Park	Acres
Creek Restoration	
California Sycamore - Coast Live Oak	0.07
Vegetation Buffer	
California sagebrush scrub	0.65
Chaparral	0.10
Delaplane Road	
Coast Live Oak	0.01
California sycamore-coast live oak	0.03
Fence	
California sagebrush scrub	0.01
Utility/Camp Trail Buffer	
California Sycamore - Coast Live Oak	0.03

Table 3.4-3
Summary of Non-Trail ESHA Impacts for Via Acero Roadway Improvements under the Modified Redesigned Alternative

Via Acero	Acres
Road Improvements	
California sagebrush scrub	0.17

Table 3.4-4
Summary of Non-Trail ESHA Impacts for Latigo Trailhead Improvements under the Modified Redesigned Alternative

Latigo Trailhead	Acres
Utility/Camp Trail Buffer	
California sagebrush scrub	0.01
California Sycamore - Coast Live Oak	0.01

Table 3.4-5
Summary of Non-Trail ESHA Impacts for Corral Canyon Improvements under the Modified Redesigned Alternative

Corral Canyon	Acres
Utility/Camp Trail Buffer	
California sagebrush scrub	1.08
Disturbed California sagebrush scrub	0.13
Chaparral	0.02
Coast live oak	0.04
Open channel/Open Water	0.02
Camping	
California sagebrush scrub	0.02
Disturbed California sagebrush scrub	0.07
Parking	
California sagebrush scrub	0.02
Restroom	
Disturbed California sagebrush scrub	0.01
Water Tank	
Disturbed California sagebrush scrub	0.01
Vegetation Buffer	
California sagebrush scrub	2.34
Disturbed California sagebrush scrub	1.28
Disturbed native grassland	0.31
Red willow/arroyo willow	0.27

Table 3.4-6
Summary of Non-Trail ESHA Impacts for Malibu Bluffs Improvements under the Modified Redesigned Alternative

Malibu Bluffs	Acres
Utility/Camp Trail Buffer	
California sagebrush scrub	0.02
Chaparral	0.02
Vegetation Buffer	
Chaparral	0.12

Table3.4-7
Primary Trail System Summary of Impacts to ESHA under the MRA

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	*Trail Improvement Impacts (Acres)*
Kanan Dume to Ramirez Canyon Park	**Trail Segment 1a**	California Sagebrush Scrub	*0.37*
		Chaparral	*0.32*
		Coast Live Oak/Toyon-Poison Oak	*0.13*
		California Sycamore–Coast Live Oak	*0.11*
	Herb Garden Trail Segment	California Sagebrush Scrub	*0.18*
	Kanan-Dume Parking Spur	California Sagebrush Scrub	*0.05*
		Chaparral	*0.15*
Ramirez Canyon Park to Murphy Way	**Trail Segment 2a3**	California Sagebrush Scrub	*1.03*
		Disturbed California Sagebrush Scrub	*0.06*
		Chaparral	*0.05*
	Trail Segment 2a6	California Sagebrush Scrub	*0.2*
		Disturbed California Sagebrush Scrub	*0.09*
Escondido Canyon Park to Solstice Canyon Park	**Trail Segment 4**	California Sagebrush Scrub	*0.2*
		Coast Live Oak	*0.13*
		Coast Live Oak/Toyon-Poison Oak	*0.22*

Table3.4-7
Primary Trail System Summary of Impacts to ESHA under the MRA

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	*Trail Improvement Impacts (Acres)*
	Trail Segment 4b	California Sagebrush Scrub	*0.31*
		Coast Live Oak	*0.01*
		Coast Live Oak/Toyon-Poison Oak	*0.01*
Latigo Canyon Road	**Trail Segment 9**	California Sagebrush Scrub	*1.25*
		Chaparral	*0.02*
		Giant Wild Rye	*0.03*
		Coast Live Oak/Toyon-Poison Oak	*0.15*
	Trail Segment 9a	California Sagebrush Scrub	*0.07*
	Trail Segment 9b	California sagebrush scrub	*0.07*
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 10b**	California Sagebrush Scrub	*0.31*
		Disturbed California Sagebrush Scrub	*0.21*
		Chaparral	*0.05*
		Disturbed Chaparral	*0.21*
		California Sycamore-Coast Live Oak	*0.12*
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 11a**	California Sagebrush Scrub	*0.54*
		Disturbed California Sagebrush Scrub	*0.06*
		Native Grassland	*0.04*
		Coast Live Oak	*0.04*
		California Sycamore-Coast Live Oak	*0.02*
		California Walnut Woodland	*0.03*
	Trail Segment 11c	California Sagebrush Scrub	*0.21*
		Disturbed California Sagebrush Scrub	*0.07*
	Trail Segment 11d	Disturbed California Sagebrush Scrub	*0.27*

Table3.4-7
Primary Trail System Summary of Impacts to ESHA under the MRA

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	*Trail Improvement Impacts (Acres)*
	Trail Segment 11e	California Sagebrush Scrub	*0.69*
		Disturbed California Sagebrush Scrub	*0.37*
		Chaparral	*0.01*
		Coast Live Oak	*0.04*
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 12**	California Sagebrush Scrub	*0.27*
		Chaparral	*0.53*
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 13a**	California Sagebrush Scrub	*0.06*
		Chaparral	*0.14*
	Trail Segment 13b	California Sagebrush Scrub	*0.07*
		Chaparral	*0.17*
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 14**	California Sagebrush Scrub	*0.47*
		Disturbed California Sagebrush Scrub	*0.11*
		Chaparral	*0.39*
		Disturbed Chaparral	*0.76*
		Coast Live Oak	*0.24*
		California Sycamore-Coast Live Oak	*0.05*
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 15**	California Sagebrush Scrub	*0.32*
		Disturbed California Sagebrush Scrub	*0.86*
		Chaparral	*1.01*
		Disturbed Chaparral	*1.37*
		Coast Live Oak	*0.42*
		Disturbed Coast Live Oak	*0.08*
Malibu Bluffs Conservancy Property (Beach to Bluffs)	**Trail Segment 16**	Southern Willow Scrub	*0.01*
	Trail Segment 17	California Sagebrush Scrub	*0.24*
		Southern Willow Scrub	*0.05*
	Trail Segment 18	No ESHA	*0.0*

Table3.4-7
Primary Trail System Summary of Impacts to ESHA under the MRA

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	*Trail Improvement Impacts (Acres)*
	Trail Segment 19	California Sagebrush Scrub	*0.09*
		TOTAL:	**16.21**

With respect to sensitive plants, similar to the Proposed Plan, the Modified Redesign Alternative would result in the loss of between 70 and 150 Catalina mariposa lily. This Alternative would result in substantially similar impacts to sensitive plants compared to the Proposed Plan. Similar to the Proposed Plan, impacts to sensitive plant species would be *potentially significant.*

Impacts to special-status wildlife habitat would be similar (see Table 3.4-1 above) under the Modified Redesign Alternative. The overall reduction in campsites would also result in relatively less indirect impacts such as increased human activity, noise, lighting, and food and trash. However, these indirect impacts would still occur even with reduced public facilities. Similar to the Proposed Plan, impacts to special-status wildlife habitat would be *potentially significant.*

The overall reduction in campsites would result in relatively less impacts to wildlife movement under the Modified Redesign Alternative. Impacts to wildlife movement would continue to be *less than significant*.

Mitigation Measures

Mitigation measures **MM BIO-1** through **MM BIO-14** required for the Proposed Plan, modified as appropriate to conform to the alternative and in response to comments, would also be required under the Modified Redesign Alternative. These mitigation measures are presented below.

Implementation of the following mitigation measure would reduce direct impacts to sensitive vegetation communities to below the threshold level.

MM BIO-1.1 Mitigation for impacts to sensitive vegetation communities shall occur in accordance with the ratios and guidelines described in the County's LUP and the City's LCP, where appropriate to compensate for direct impacts to sensitive vegetation

communities, including sage scrub and chaparral communities, native grassland habitat, and riparian and bottomland habitats.

MM BIO-1.2 Mitigation efforts shall occur on lands currently owned and managed by the Conservancy/ MRCA. If it is determined during the planning process that additional land is required beyond what is supported by existing Conservancy/MRCA-managed lands, then an appropriate off-site location(s) will be identified and approved by the Coastal Commission and CDFG prior to implementation.

MM BIO-1.3 The mitigation sites shall be revegetated with indigenous plant species of local (Santa Monica Mountains) genetic stock. No plant species listed as problematic and/or invasive by the CNPS (http://www.cnps.org/), the California Invasive Plant Council (formerly the California Exotic Pest Plant Council) (http://www.cal-ipc.org/), or as may be identified by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a "noxious weed" by the State of California or the federal government shall be utilized within the property. All plant palettes shall be reviewed by a qualified biologist and/or habitat restoration specialist familiar with those plants native or endemic to this region of California.

MM BIO-1.4 Development involving access and recreation improvements within areas containing one or more native oak, California walnut, western sycamore, alder, or toyon tree that has at least one trunk measuring 6 inches or more in diameter (or a combination of any two trunks measuring a total of 8 inches or more in diameter), measured at 4.5 feet above natural grade, shall be subject to the provisions of Chapter 5, "Native Tree Protection Ordinance" of the Malibu LCP Local Implementation Plan, which requires the preparation of a tree protection plan and mandates mitigation at a ratio of 10:1 for significant impacts to all native trees meeting the size dimensions above. In order to implement a cohesive mitigation plan for the project, trees planted in accordance with the tree protection plan may be integrated into the habitat restoration plan for the project.

MM BIO-1.5 A habitat restoration plan to address impacts to both sensitive uplands and wetlands habitats shall be prepared by qualified

personnel with experience in Southern California ecosystems and native plant revegetation techniques.

MM BIO-1.6 The habitat restoration plan shall include, at minimum, the following information:

(a) the location of the mitigation site(s);

(b) the plant species to be used, container sizes, and seeding rates;

(c) the plant materials' sources and lead time;

(d) a schematic depicting the mitigation areas;

(e) a planting schedule;

(f) a description of installation requirements, irrigation sources and methodology, erosion control, and maintenance and monitoring requirements;

(g) a description of the goals of the restoration program

(h) a weed eradication plan (i.e., measures to properly control exotic vegetation on site);

(i) site-specific success criteria;

(j) a detailed monitoring program;

(k) contingency measures shall the success criteria not be met;

(l) a summary of the annual reporting requirements; and,

(m) identification of the responsible party(ies) for meeting the success criteria and providing for conservation of the mitigation site(s) in perpetuity.

MM BIO-1.7 Planting of the revegetation sites shall occur between October 1 and April 30, when feasible, to take advantage of the winter/spring rainy season.

MM BIO-1.8 Interim annual and final performance criteria for each potential mitigation site and vegetation community are provided below. Vegetation cover is expressed as percent absolute cover for native and non-native vegetation. For native cover, the percentages listed shall be the minimum attained to be considered successful, and for non-native cover, the percentages listed shall not be exceeded.

Vegetation Community	Year 1 (%)	Year 2 (%)	Year 3 (%)	Year 4 (%)	Year 5 (%)
Malibu Bluffs					
Coastal scrub	15	30	50	65	75
Perennial exotic cover	5	5	5	5	5
Coral Canyon					
Coastal scrub	15	25	40	50	65
Perennial exotic cover	30	20	10	10	10
Native Grasslands	10	20	35	45	55
Tuna/Las Flores					
Chapparral/Coastal scrub	15	25	40	50	65
Perennial exotic cover	5	5	5	5	5
King Gillette Ranch					
Southern willow scrub	20	35	50	65	80
Sycamore-Coast live oak woodland	15	25	35	55	75
Perennial exotic cover	5	5	5	5	5
Ramirez Canyon					
Southern willow scrub	20	35	50	65	80

MM BIO-1.9 A report (describing as-built status of the revegetation program and including topographic maps and planting locations) shall be provided to the Coastal Commission (and ACOE, CDFG, and RWQCB for wetlands mitigation) for review within 90 days of mitigation site preparation and planting.

MM BIO-1.10 An annual report shall be provided to the Coastal Commission and other reviewing resource agencies (ACOE, CDFG, and RWQCB for wetlands) by January 1 in years one through five (after planting the mitigation sites). The annual reports shall

include (a) an overview of the mitigation efforts; (b) pre-project photos of all the mitigation areas taken from photo points to be used for all subsequent photos; (c) photos taken from each photo point established prior to project activities; (d) the number, by species, of plants replaced; (e) the survival, percentage cover, and height of both tree and shrub species; and (f) the methods used to assess these parameters.

MM BIO-1.11 Where minor alteration of natural streams for the purpose of stream crossings (vehicular or pedestrian) is necessary to provide access to and within public recreation areas, the following development standards shall be applied:

- Use of Arizona crossings shall be limited to repair and maintenance of existing, legal crossings consistent with the repair and maintenance provisions of Section 13.4.2, "Repair and Maintenance Activities," of the City of Malibu LCP Local Implementation Plan.

- All new stream crossings shall consist of a span bridge design that minimizes placement of any new structures within the streambed or channel and avoids removal of natural riparian vegetation to the maximum extent feasible.

- Construction activities shall be scheduled to occur during the dry season.

- Staging areas outside of the riparian canopy shall be identified and flagged for construction workers and to store materials.

- Monitoring of stream-crossing construction activities shall be conducted by a qualified biologist or environmental resource specialist. The biologist/resource specialist shall be responsible for advising construction workers on potential resource damage avoidance prior to the commencement of any on-site activities.

- These provisions shall not apply to existing or proposed pedestrian stream crossings along hiking trails where no

alteration of the natural stream channel is required to accommodate access.

MM BIO-1.12 All new public restroom facilities shall consist of self-contained chemical restrooms (except for new restrooms proposed at Ramirez Canyon Park), which shall be sited and designed to ensure that impacts to ESHA and water quality are avoided. Where feasible, self-contained restroom facilities shall be located a minimum of 200 feet from the top of bank of any adjacent stream, and in no case shall they be located less than 100 feet from the top of bank of any adjacent stream or the outer edge of riparian vegetation (except at Ramirez Canyon Park, at a limited (no more than 10 spaces) Latigo trailhead parking and picnic area for Escondido Canyon Park, where restroom facilities shall be located no less than 25 feet from top of stream bank), which ever is the most protective. Minimal grading to create minor berms around the facilities shall be allowed, provided it is not in violation of other LCP or LUP resource protection policies, to ensure run-off is contained in the vicinity and/or is conveyed and filtered through bioswales. Self-contained restroom facilities shall be maintained pursuant to manufacturer specifications at all times.

MM BIO-1.13 In no case shall new support facilities (not associated with low-impact campsites) be located less than 100 feet from the top of bank of all streams or from the outer edge of riparian vegetation, whichever is the most protective (excepting support facilities within Ramirez Canyon Park, a limited [no more than 10 space] Latigo trailhead parking and picnic area for Escondido Canyon Park, and an Americans with Disabilities Act (ADA) compliant drop-off area at Corral Canyon Park, all of which may be located closer to the stream bank provided they are still no less than 25 feet from top of stream bank).

MM BIO-1.14 All site preparation and construction activities shall incorporate standard construction BMPs including, but not limited to, straw bales, gravel bags, sand bags, the periodic watering of bare areas, and the direction of construction area drainage to existing storm drain facilities.

MM BIO-1.15 Campsites shall be located a minimum of 100 feet from the top of bank of all streams or from the outer edge of riparian vegetation, whichever is the most protective. Reduced stream corridor setbacks may be permitted for low-impact campsites if a qualified biologist or environmental resource specialist determines, to the satisfaction of the reviewing body, that potential impacts to riparian corridors will be avoided or appropriately mitigated and that there is no alternative site design to meet these setback requirements given other environmental constraints such as sensitive habitat, archaeological resources or topography.

MM BIO-1.16 Campsites shall be located in areas of level terrain, as much as feasible, to avoid the need for grading and the need for excessive maintenance requirements that may be necessary for substantially altered sites. Exceptions to this specific requirement shall be provided for campsites specifically designed to facilitate disabled access, in which case grading shall be minimized to the maximum extent feasible, and the development will still need to satisfy other resource protection requirements.

MM BIO-1.17 To the extent possible consistent with other resource protection policies, campsites shall be located in proximity to maintenance and/or administrative access points to provide for easy access and to minimize potential impacts to sensitive habitat areas associated with maintenance requirements.

MM BIO-1.18 Where appropriate, native, indigenous vegetation of local genetic stock shall be planted to provide a buffer between campers and trail users and to screen camp facilities from adjacent trails, parking areas, and day-use facilities.

MM BIO-1.19 No mitigation required as compared to the Proposed Plan.

Implementation of the following mitigation measures would reduce short-term indirect impacts to sensitive vegetation communities to below the threshold level.

MM BIO-2.1 Prior to the issuance of a grading permit(s) for areas within and adjacent to ESHA, a biologist shall be retained and approved by the Conservancy/MRCA and CDFG to monitor construction activities. The biologist will monitor all grading and other significant ground disturbing activities in or adjacent to open space

areas to ensure that the project complies with the applicable standard conditions and mitigation measures.

MM BIO-2.2 Prior to the commencement of grading operations or restoration activities, the work area shall be demarcated with temporary fencing or other markers clearly visible to construction personnel.

Implementation of the following mitigation measure would reduce long-term impacts to sensitive vegetation communities to below the threshold level.

MM BIO-3 A Plan signage program shall be prepared to provide information on regulations required to promote safe use of the project area and resource protection. Appropriate signage and visual cues shall also serve to clearly identify the designated public parking areas and public trails throughout the Plan area to avoid conflicts with private property and sensitive habitat areas. The Plan shall also include requirements for appropriate fencing and signage installation around restoration areas for purposes of identifying sensitive habitats and educating visitors of ESHA occurrence and/or restoration efforts.

Implementation of the following mitigation measures would reduce direct impacts to sensitive plant species to below the threshold level.

MM BIO-4.1 Pre-construction rare plant surveys, using the survey methodologies outlined in *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFG, 2009), shall be conducted in all areas supporting suitable habitat for those special status species that have a moderate to high potential to occur in the study area as described in the Biological Technical Report.

MM BIO-4.2 See MM BIO-1.11 through MM BIO-1.19.

MM BIO-4.3 If the final trail alignment is designed such that all impacts to Catalina mariposa lily are avoided, then no additional mitigation will be required. However, in the event that impacts to Catalina mariposa lily are anticipated, additional field surveys to determine the amount of area covered by this species and approximate densities shall be conducted during the appropriate blooming period prior to site preparation and/or grading activities in areas

potentially supporting this species. Locations of individual plants or plant populations shall be appropriately flagged, and (1) seeds from a representative mix of individual plants shall be collected and sown in appropriate habitats, or on cut slopes, and (2) the bulbs shall be harvested and transplanted to areas of appropriate habitat that are not subject to further disturbance. The goal will be to produce replacement populations of in-kind plants reaching maturity, at a ratio of 1:1 with respect to the number and density of plants (estimated) to be lost.

MM BIO-4.4 A Mitigation and Monitoring Plan for the Catalina mariposa lily shall be prepared and submitted to the Conservancy/MRCA and Coastal Commission for review and approval prior to ground disturbance to occupied habitat. Upon approval, the plan shall be implemented by the Applicant or its designee. The revised plan shall demonstrate the feasibility of enhancing or restoring Catalina mariposa lily habitat in selected areas to be managed as natural open space without conflicting with other resource management objectives. Habitat replacement/enhancement shall be at a 1:1 ratio (acres restored/enhanced to acres impacted). The revised plan shall specify: (1) the location of mitigation sites; (2) a description of "target" vegetation; (3) site preparation measures; (4) methods for the removal of non-native plants; (5) the source of all plant propagules and the quantity and species of seed or potted stock of all plants to be introduced or planted into the restoration/enhancement areas; (6) a schedule and action plan to maintain and monitor the enhancement/restoration areas, to include at minimum, qualitative annual monitoring for revegetation success and site degradation due to erosion, trespass, or animal damage for a period no less than 2 years; (7) measures such as fencing, signage, or security patrols as needed; and (8) contingency measures such as replanting, weed control, or erosion control to be implemented if habitat improvement/restoration efforts are not successful. Catalina mariposa lily propagules (seed or bulbs) shall be introduced onto the site when habitat restoration/enhancement is judged successful, determined by: 1% cover and species richness of native species reach 50% of their cover and species richness at undisturbed occupied Catalina mariposa lily habitat at reference sites; and (2) the replacement vegetation has persisted at least one summer without irrigation.

The revised plan shall specify methods to collect propagules and introduce Catalina mariposa lily into these mitigation sites. Introductions shall use source material (seeds or bulbs) from no more than 1.0 mile distant, similar slope exposures, and no more than 500 feet of elevational difference from the mitigation site, unless otherwise approved by Conservancy/MRCA and the Coastal Commission. Bulbs may be salvaged and transplanted from Catalina mariposa lily occurrences to be lost; alternately, seed may be collected from protected occurrences, following CDFG-approved seed collection guidelines (i.e., Memorandum of Understanding for rare plant seed collection). The Applicant or a designee shall monitor the reintroduction sites for no fewer than 5 additional years to estimate Catalina mariposa lily survivorship (for bulbs) or seedling establishment (for seeded sites).

MM BIO-4.5 While not observed by Dudek during 2009 surveys, Coulter's saltbush has been previously documented on the Conservancy's Malibu Bluffs property along a coastal bluff near Malibu Road. If Coulter's saltbush is observed during future surveys and found to be impacted by the final trail alignment and cannot be avoided, the Applicant shall retain a qualified, experienced biologist to prepare a comprehensive translocation plan for Coulter's saltbush that will include the location of a suitable receptor site. The plan shall be prepared in cooperation with the USFWS and the CDFG. A qualified biologist shall supervise and monitor implementation of the plan. Once the population of Coulter's saltbush on site is transplanted to a suitable receptor site, a qualified biologist shall monitor the population for 5 years, documenting the methods and results, including implementation of any requisite maintenance and/or remedial measures in annual reports. Establishment of a viable population shall be deemed successful and the performance standards met if at least half (i.e., nine) of the plants are evident in any given year following the third year of the monitoring period. This mitigation standard may be adjusted at any time prior to the end of the monitoring period under mutual agreement by the Applicant and the resource agencies (i.e., USFWS and CDFG), particularly if factors beyond human control limit the ability to establish a viable population of Coulter's saltbush within the 5-year monitoring period. If it becomes apparent that the performance standards cannot be achieved, the Applicant and

resource agencies may agree to extend the monitoring period and/or implement remedial measures.

Implementation of the following mitigation measure would reduce short-term indirect impacts to sensitive plant species to below the threshold level.

Refer to **MM BIO-2.1** and **MM BIO-2.2.**

Implementation of the following mitigation measure would reduce long-term indirect impacts to sensitive plant species to below the threshold level.

Refer to **MM BIO-3.1.**

Implementation of the following mitigation measure would reduce direct impacts to nesting birds to below the threshold level.

MM BIO-7 To avoid direct impacts to nesting raptors and songbirds, construction of the project shall be phased to avoid the migratory bird nesting season (typically February 15 through August 31). If project construction must occur during the migratory bird nesting season, a focused avian nesting survey shall be performed in the development footprint and within 300 feet of the proposed development by a qualified biologist within 72 hours prior to construction. If an active bird nest is found, the nest will be flagged and mapped on the construction plans along with an appropriate buffer, which will be determined by the biologist in consultation with the USFWS and CDFG based on the biology of the species. The nest area will be avoided until the nest is vacated and the juveniles have fledged. The nest area will be demarcated in the field with flagging and stakes or construction fencing. Please note that construction will be permitted in areas outside of the nest and buffer area. If nesting birds are present on site, a biological monitor shall be present daily while the nest(s) is active to ensure that no impacts to nesting birds occur.

Implementation of the following mitigation measure would reduce impacts to California gnatcatchers to below the threshold level.

MM BIO-8 To avoid potential direct impacts to the California gnatcatcher, construction shall be conducted outside of the breeding season for this species (February 15–August 31), where practicable. If

construction must occur during the breeding season for the California gnatcatcher, the following measures shall be implemented:

1. Prior to any construction-related activity, the biologist shall survey up to 500 feet from the proposed construction areas in accordance with current USFWS protocol for this species.

2. If no California gnatcatchers are found to be present within areas up to 500 feet of the proposed construction area, then project construction may proceed without restrictions.

3. If California gnatcatchers are found in on site or adjacent areas, construction within 500 feet shall not commence until temporary noise barrier(s) are in place between the construction area and occupied gnatcatcher habitat. The location of the noise barrier(s) shall be determined by the biologist and acoustician. Construction noise levels shall be monitored at the edge of occupied habitat with the noise barrier(s) in place. Other measures shall be implemented, as necessary, to reduce noise levels to below 60 dB(A), or to the ambient noise level if it already exceeds 60 dB(A) at the edge of the occupied habitat.

4. If California gnatcatchers are found on site or in adjacent areas, construction noise shall be monitored once weekly to verify that noise at the edge of occupied habitat is maintained below 60 dB(A), or to the ambient noise level if it already exceeds 60 dB(A). If this requirement cannot be met, other measures shall be implemented as necessary, to reduce noise levels to below 60 dB(A) or to the ambient noise level if it already exceeds 60 dB(A). Such measures may include, but are not limited to, placement of construction equipment and limitations on the simultaneous use of equipment

Implementation of the following mitigation measure would reduce indirect impacts to nesting birds to below the threshold level.

Refer to **MM BIO-7.**

Implementation of the following mitigation measures would reduce long-term indirect impacts to special-status wildlife species to below the threshold level.

MM BIO-10.1 A Contractor Education Program shall be prepared and implemented to apprise all construction personnel and subcontractors of environmental restrictions relevant to construction and the penalties for violations. A protocol for communicating problems or potential construction changes that may affect biological resources shall be established with the Contractor and the Applicant. Workers shall be made aware of protected habitat and the occurrence of sensitive species in the area through the use of photos or on-the-ground demonstration. The sensitivity of certain special-status wildlife species to human activities, the legal protection afforded to those species, and the roles and authority of monitoring biologists shall also be discussed.

MM BIO-10.2 The monitoring biologist shall be on site during any clearing of habitat (annual ground cover, shrubs, or trees). The monitoring biologist will flush sensitive species (avian or other mobile species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities.

1) San Diego Desert Woodrat: Prior to construction activities in grassland, scrub, chaparral, oak woodland, riverbank, and agriculture habitats, or other suitable habitat a qualified biologist shall conduct a survey within the proposed construction disturbance zone and within 200 feet of the disturbance zone for San Diego desert woodrat nests. If active San Diego desert woodrat (Neotoma lepida intemedia) nests are identified within the disturbance zone, under the supervision monitoring biologists, woodrat stick nests shall be nudged with a front end loader to encourage woodrats to abandon the nests and to escape into adjacent areas. The nest structure shall then be carefully and slowly picked up with a front-end loader to allow any additional woodrats to escape. The nest structure shall then be moved to adjacent undisturbed habitat. If suitable habitat is not available immediately adjacent to impact areas, new habitat on adjacent areas not impacted by the project shall be created by providing a vertical structure composes of laying downed or cut trees stacked

horizontally in areas that are under a shady canopy, or piling rocks under a shady canopy, to achieve this structure. No trapping and/or hand removal of nesting materials shall occur.

2) Low Mobility Species: Pre-construction surveys and avoidance measures shall be implemented for low mobility species, such as coast horned lizard and silvery legless lizards. During brush-clearing and earth-moving activities occurring in or directly adjacent to occupied or suitable habitat for low mobility species, pre-construction surveys shall be conducted by the project biologist to determine if low-mobility special-status species are present. If visual searches or raking are used for pre-construction surveys, the project biologist shall conduct surveys no earlier than 72 hours prior to disturbance, and if pitfall trapping is used, the Project Biologist shall conduct trapping no earlier than 5 days prior to disturbance. If these species are located in the disturbance zone, then individuals shall be captured and relocated, or allowed to escape, to suitable habitat for the species outside of the disturbance footprint.

MM BIO-10.3 Avoid and/or minimize the use of lighting within the study area. In proposed parking facilities, lighting fixtures shall comply with local standards for shielded low sodium, low wattage lighting designed to cut glare and light scatter and to direct light away from sensitive biological resources.

MM BIO-10.4 To ensure that intermittent noise levels do not adversely affect adjacent wildlife uses, the Conservancy/MRCA shall be required to prepare and submit to the Coastal Commission for review a set of campground noise restrictions, which would include at minimum the establishment and enforcement of "quiet hours" to minimize potential minor increases in noise levels at campground and parking facilities.

MM BIO-10.5 Protect wildlife by providing trash receptacles and food storage lockers for camping areas.

MM BIO-10.6 Trash cans with secure lids shall be provided at trailheads, parking lots, and campsites. Trash cans shall be checked and emptied if necessary four to seven days per week (depending on use, season, etc.) Trash would be taken by MRCA staff to King Gillette Ranch,

where trash service currently is provided. All trash cans at trail heads or campsites would be accessed by foot or vehicle (e.g., maintenance truck). The maintenance truck would access the trash cans at specific maintenance access points. MRCA will pick up trash along trails (during patrols or maintenance/monitoring) by hand or by hand tool. Sources of funding for maintenance include campground fees and MRCA discretionary revenue derived from filming, leases, and other sources.

MM BIO-10.7 Dogs must be on a leash at all times while on parklands.

MM BIO-10.8 Provide routine trail and campsite maintenance to ensure that outdoor enthusiasts are limiting their camping and hiking experience to the campsites and trails provided.

MM BIO-10.9 To enforce campground restrictions, a camp host, staff maintenance person, or ranger who is wildland fire-trained shall be on site at each park property during those times when camping is permitted. This shall be accomplished by either providing for residency of a camp host, staff maintenance person, or ranger at existing park properties or by ensuring that support facilities and apparatus are provided to sustain continuous daily and nightly patrols to strictly enforce the "No Campfire" policy and use restrictions relating to hazardous conditions. Park patrols shall be conducted daily at each park property when campers are present. Adjustments to patrol procedures will be made as necessary to ensure park rule enforcement and compliance.

MM BIO-10.10 No person shall make or maintain, nor aid and abet others in making or maintaining, a campfire or any other open fire in any of the park facilities covered by this report. Development, use restrictions, and brush maintenance for all campsites shall be strictly enforced.

MM BIO-10.11 Signs shall be included in park development projects and/or shall be provided at existing facilities where determined appropriate for the purpose of identifying sensitive habitats and educating visitors of ESHA occurrence and/or restoration efforts.

MM BIO-10.12 Regulatory signs shall be provided at park entrance areas, staging areas or gathering points and may include, but need not be limited

to, the following information: 1) permitted use of the area or facility being posted, 2) general regulations at trailheads, 3) general regulations at jurisdiction boundaries, 4) regulations required to promote safe use of an area (including limitations on fires) and resource protection, and 5) identification of private property boundaries, and 6) warning and guidelines about the New Zealand mudsnail.

MM BIO-10.13 All proposed park fencing shall be designed to allow for wildlife passage.

MM BIO-10.14 Motorized vehicle access by park personnel within parklands shall avoid sensitive habitat areas and shall be limited to existing maintenance routes to the maximum extent feasible, and shall be for the purposes of conducting maintenance, providing emergency services, conducting patrols, implementing habitat restoration, assisting accessibility to camps with fully accessible campsites and facilities, and providing other park services.

Implementation of the following mitigation measures would reduce impacts to wildlife corridors and habitat linkages corridor to below the threshold level.

Refer to **MM BIO-10.1** through **MM BIO-10.14.**

Implementation of the following mitigation measures would reduce direct impacts to native trees to below the threshold level.

MM BIO-13.1 Where development encroaches into the root zone of native trees, each affected tree shall be monitored annually for a period of not less than 10 years. An annual monitoring report shall be submitted for review by MRCA for each of the 10 years. Should any of these trees be lost or suffer worsened health or vigor as a result of the proposed development, the applicant shall mitigate the impacts at a 10:1 ratio with seedling-sized trees.

MM BIO-13.2 Protective fencing shall be used around the outermost limits of the protected zones of the native trees within or adjacent to the construction area that may be disturbed during construction activities. Before the commencement of any clearing, grading, or other construction activities, protective fencing shall be placed around each applicable tree. Fencing shall be maintained in place

for the duration of all construction. No construction, grading, staging, or materials storage shall be allowed within the fenced exclusion areas or within the protected zones of any of the sites native trees. The fencing shall be installed 5 feet outside of the dripline of each native tree (or edge of canopy for cluster of trees) and shall be staked every 6 feet.

MM BIO-13.3 Any approved development, including grading or excavation that encroaches into the protected zone of a native tree shall be completed using only hand-held tools or other methods that avoid damage to tree roots such as air spade excavation.

MM BIO-13.4 Any trail or pathway that encroaches under a tree's crown shall be constructed to minimize encroachment to the maximum extent feasible. Construction and trail maintenance crews shall ensure that the natural duff layer under all trees be maintained. This will reduce soil compaction, stabilize soil temperatures in root zones, conserve soil moisture, and reduce erosion. The contractors shall ensure that the mulch be kept clear of the trunk base to avoid creating conditions favorable to the establishment and growth of decay-causing fungal pathogens. Should it become necessary to add organic mulch beneath retained oak trees, packaged or commercial oak leaf mulch shall not be used, as it may contain Oak Root Fungus. Also, the use of Redwood chips shall be avoided as certain inhibitive chemicals may be present in the wood. Other wood chips and crushed walnut shells can be used, but the best mulch that provides a source of nutrients for the tree is its own leaf litter. Any added organic mulch added by the contractor shall be applied to a maximum depth of 4 inches.

MM BIO-13.5 Grade Changes: It is assumed that minor grade changes will be necessary to level camp site pads and to even trail sections that may occur beneath tree crowns. Wherever feasible, grade changes, including adding fill, shall be minimized unless completed by or under supervision by a Certified Arborist.

MM BIO-13.6 Root Pruning: Roots primarily extend in a horizontal direction forming a support base to the tree similar to the base of a wineglass. Where pruning is necessary in areas that contain tree roots, prune the roots using a root pruner that makes clean cuts.

All cuts will minimize ripping, tearing, and fracturing of the root system.

MM BIO-13.7 Crown Pruning Cuts: All pruning shall be completed under the direction of an ISA-certified Arborist and using ISA guidelines. Removal of live branches and associated leaf area can have a negative impact on tree health. When relatively large amounts of leaf area are removed, the capacity of a tree to produce energy for growth and pest resistance is diminished. Pruning shall be limited to that amount needed to accomplish the pruning objective. In some cases, it may be best to complete pruning over a 2- or 3-year period rather than do all that is needed in 1 year. Where tree crowns occur over camp site's removal of dead and dying limbs is recommended to occur on a regular basis.

MM BIO-13.8 The project arborist shall monitor all soil disturbing activities occurring directly under tree crowns, including demolition, excavation, and installation. This will require the project agent and/or contractor to notify the project arborist well in advance of scheduled work adjacent to protected trees. A preconstruction conference with the arborist and contractor shall occur prior to commencement of activities.

Implementation of the following mitigation measure would reduce indirect impacts to native trees to below the threshold level.

MM BIO-14 Remaining native trees that are not directly impacted by the Plan's implementation shall be preserved and protected in place. Trees within approximately 20 feet of proposed construction activity shall be temporarily fenced with chain link or other material meeting Coastal Commission standards throughout all grading and construction activities. The fencing shall be installed 5 feet outside of the dripline of each native tree (or edge of canopy for cluster of trees) and shall be staked every 6 feet.

Residual Impacts

With implementation of MM BIO-1 through BIO-14, potential impacts to biological resources would be ***less than significant (Class II)***.

Analysis of Impacts Post-Mitigation

The general discussion of potential biological resources impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.4.3 Cumulative Impacts

The general discussion of cumulative biological resources impacts for the Proposed Plan (as identified in the Draft EIR and in Response to Comment YY-81) would also be applicable to the Modified Redesign Alternative.

3.4.4 Comparative Analysis

The overall impact level of the Modified Redesign Project Alternative on biological resources would be considered *potentially significant, but mitigable* (*Class II)* (the same as for the Proposed Plan). Although impacts to sensitive vegetation communities, sensitive wildlife habitat, and sensitive plant species would be similar, impacts to native trees and wildlife movement would be reduced compared to the Proposed Plan, as a result of a reduction in campsites and parking. ***Therefore, impacts on biological resources would be substantially similar to or marginally less than the Proposed Plan.***

3.5 Cultural Resources

3.5.1 Setting

The setting for this alternative section would not differ from that identified with Section 5.5, *Cultural Resources*, of the Draft EIR.

3.5.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would not differ from that identified with Section 5.5, *Cultural Resources*, of the Draft EIR.

Project Impacts

The Redesigned Project Alternative would reduce the number of the proposed camping and parking facilities that would potentially impact unknown cultural resources within the proposed Plan site area. However, impacts would still be considered *potentially significant* for Corral Canyon Park and Malibu Bluffs.

Mitigation Measures

Mitigation measures required for the Proposed Plan would also be required under the Modified Redesign Alternative. No additional mitigation measures would be required. The mitigation measures are listed below.

MM CR-1.1 A pre-construction workshop shall be conducted by a City of Malibu- or County of Los Angeles-qualified archaeologist and a local Native American representative. Attendees shall include the applicant, construction supervisors, and heavy equipment operators. All construction personnel who would work during any phase of ground disturbance shall be required to attend the workshop. The names of all personnel who attend the workshop shall be recorded.

The workshop shall address the following: review the types of archaeological resources that may be uncovered; provide examples of common archaeological artifacts and other cultural materials to examine; describe a reasonable worst-case discovery scenario (i.e., disco very of intact human remains or a substantial midden deposit) and describe reporting requirements and

responsibilities of the construction supervisor and crew. The workshop shall make attendees aware of prohibited activities, including unauthorized collecting of artifacts, which can result in impacts on cultural resources.

MM CR-1.2 All earth disturbances associated with the proposed "ADA drop off" along PCH in the Corral Canyon Park area and the proposed camping facility in the far western portion of the Malibu Bluffs shall be monitored by a City of Malibu- or County of Los Angeles-qualified archaeologist and a local Native American representative, funded by the applicant. The qualified archaeologist and local Native American representative shall evaluate the intactness and potential significance of all previously unknown cultural resources encountered during construction. If found to be significant, the resource shall be subject to appropriate mitigation.

MM CR-1.3 A Construction Monitoring Treatment Plan shall be developed and implemented to ensure that any new discoveries associated with CA-LAN-310 (in the area of the proposed "ADA drop-off" along PCH in the Corral Canyon Park area) and CA-LAN-479 (in the area of the proposed camping facility in the far western portion of the Malibu Bluffs) are adequately recorded, evaluated, and if significant, mitigated.

Plan Requirements and Timing: A Construction Monitoring Treatment Plan shall be developed by a qualified archaeologist retained by MRCA and implemented to ensure that any previously unknown archaeological site areas, features, or artifact concentrations are adequately recorded, evaluated, and, if significant, mitigated. The Plan shall minimally describe the following:

a. Qualifications and organization of monitoring personnel;

b. Procedures for notifying the City of Malibu and/or County of Los Angles and other involved or interested parties in case of a new discovery;

c. Procedures that would be used to record, evaluate, and mitigate new discoveries with a minimum of delay;

d. Procedures that would be followed in case of discovery of disturbed as well as intact human remains;

e. Specifications that all ground disturbances associated with the proposed "ADA drop-off" along PCH in the Corral Canyon Park area and the proposed camping facility in the far western portion of the Malibu Bluffs shall be monitored by a City- or County-qualified archaeologist and a local Native American representative, funded by the applicant. The monitors shall have the authority to temporarily halt and/or redirect construction in the vicinity of any potentially significant discovery to allow for adequate recordation, evaluation, and mitigation. Evaluation and mitigation could require archaeological testing and data recovery. In the unlikely event that human remains would be encountered, consultation with the most likely Native American descendant pursuant to Public Resources Code section 5097.97 and 5097.98 would apply.

The Construction Monitoring Treatment Plan shall be prepared by a City of Malibu- or County of Los Angeles-qualified archaeologist, and funded by the applicant. The monitoring program and its results shall be documented in a short letter report within 30 days after completion of all construction activities.

Monitoring: MRCA staff shall verify in the field the presence of the project archaeologist and Native American construction monitor(s). In the event of the identification of any previously unknown archaeological site area, feature, or artifact concentration, the project archaeologist shall be consulted and review and approve any treatment plan for evaluating the significance of the find and determining appropriate mitigations.

MM CR-4 In the unlikely event that potentially significant archaeological resources are encountered during construction of any proposed Plan trails, camping facilities, or parking facilities outside of the 30.5 meter (100 foot) buffer around recorded archaeological site boundaries, ground disturbances shall be temporarily halted, and the significance of the resources shall be evaluated by a City of

Malibu- or County of Los Angeles-qualified archaeologist and a local Native American representative during a Phase 2 archaeological investigation consistent with the City of Malibu Local Coastal Program Local Implementation Plan, Chapter 11, Archaeological/Cultural Resources guidelines. If the resource is determined to be significant, a Phase 3 data recovery mitigation program shall be completed consistent with the City of Malibu Local Coastal Program Local Implementation Plan, Chapter 11, Archaeological/Cultural Resources guidelines.

Plan Requirements and Timing: The above mitigation shall be identified on all grading, construction, and restoration plans and shall be faithfully implemented during earth disturbance activities.

Monitoring: MRCA staff shall instruct construction workers on the implementation of this condition in advance of construction. In the event of the identification of any previously unknown archaeological site area, feature, or artifact concentration, the project archaeologist shall be consulted and review and approve any treatment plan for evaluating the significance of the find and determining appropriate mitigations.

MM CR-6: In the event paleontological soils are uncovered during grading, a paleontological monitor shall be retained by the applicant to oversee ground disturbing activities, including but not limited to all grading, excavation, and site preparation. The paleontological monitor shall have the authority to halt any activities adversely impacting potentially significant resources. Should fossil-bearing formations be uncovered, the monitor shall professionally collect any specimens without impeding development. Any paleontological artifacts recovered shall be preserved, as determined necessary by the project paleontologist, and offered to an accredited and permanent scientific institution for the benefit of current and future generations.

This mitigation measure shall also apply to trenching for utilities, geological testing, and any other ground-disturbing activities associated with the proposed Plan.

Plan Requirements and Timing: The above mitigation shall be identified on all grading, construction, and restoration plans and shall be faithfully implemented during earth disturbance activities.

Monitoring: MRCA staff shall instruct construction workers on the implementation of this condition in advance of construction. In the event of the identification of any previously unknown paleontological site area, feature, or artifact concentration, the project paleontologist shall be consulted and review and approve any treatment plan for evaluating the significance of the find and determining appropriate mitigations.

MM CR-7.1 Biological Resources mitigations in the mapped CA-LAN-310 boundary, and a 100-foot buffer around the boundary, in the proposed Corral Canyon Mitigation Site shall be implemented with hand tools and shall not exceed six (6) inches in depth.

MM CR-7.2 All earth disturbances associated with Biological Resources mitigations in the mapped CA-LAN-310 boundary, and a 100-foot buffer around the boundary, in the proposed Corral Canyon Mitigation Site shall be monitored by a City of Malibu- or County of Los Angeles-qualified archaeologist and a local Native American representative, funded by the applicant. The qualified archaeologist and local Native American representative shall evaluate the intactness and potential significance of all previously unknown cultural resources encountered during construction. If found to be significant, the resource shall be subject to appropriate mitigation.

MM CR-7.3 A Construction Monitoring Treatment Plan shall be developed and implemented to ensure that any new discoveries associated with CA-LAN-310 (in the proposed Corral Canyon Mitigation Site) are adequately recorded, evaluated, and if significant, mitigated.

Plan Requirements and Timing: A Construction Monitoring Treatment Plan shall be developed by a qualified archaeologist retained by MRCA and implemented to ensure that any previously unknown archaeological site areas, features, or artifact concentrations are adequately recorded, evaluated, and, if

significant, mitigated. The Construction Monitoring Treatment Plan shall minimally describe the following:

a. Qualifications and organization of monitoring personnel;

b. Procedures for notifying the City of Malibu and/or County of Los Angles and other involved or interested parties in case of a new discovery;

c. Procedures that would be used to record, evaluate, and mitigate new discoveries with a minimum of delay;

d. Procedures that would be followed in case of discovery of disturbed as well as intact human remains;

e. Specifications that all ground disturbances associated with Biological Resources mitigations in the mapped CA-LAN-310 boundary, and a 100-foot buffer around the boundary, in the proposed Corral Canyon Mitigation Site shall be monitored by a City- or County-qualified archaeologist and a local Native American representative, funded by the applicant. The monitors shall have the authority to temporarily halt and/or redirect construction in the vicinity of any potentially significant discovery to allow for adequate recordation, evaluation, and mitigation. Evaluation and mitigation could require archaeological testing and data recovery. In the unlikely event that human remains would be encountered, consultation with the most likely Native American descendant pursuant to Public Resources Code section 5097.97 and 5097.98 would apply.

   The Construction Monitoring Treatment Plan shall be prepared by a City of Malibu- or County of Los Angeles-qualified archaeologist, and funded by the applicant. The monitoring program and its results shall be documented in a short letter report within 30 days after completion of all construction activities.

   Monitoring: MRCA staff shall verify in the field the presence of the project archaeologist and Native American construction monitor(s). In the event of the identification of any previously

unknown archaeological site area, feature, or artifact concentration, the project archaeologist shall be consulted and review and approve any treatment plan for evaluating the significance of the find and determining appropriate mitigations.

MM CR-8.1 All earth disturbances associated with Biological Resources mitigations in the mapped CA-LAN-1915 boundary, and a 100-foot buffer around the boundary, in the proposed Tuna/Las Flores Canyon Mitigation Site shall be monitored by a City of Malibu- or County of Los Angeles-qualified archaeologist and a local Native American representative, funded by the applicant. The qualified archaeologist and local Native American representative shall evaluate the intactness and potential significance of all previously unknown cultural resources encountered during construction. If found to be significant, the resource shall be subject to appropriate mitigation.

MM CR-8.2 A Construction Monitoring Treatment Plan shall be developed and implemented to ensure that any new discoveries associated with CA-LAN-1915 (in the proposed Tuna/Las Flores Canyon Mitigation Site) are adequately recorded, evaluated, and if significant, mitigated.

Plan Requirements and Timing: A Construction Monitoring Treatment Plan shall be developed by a qualified archaeologist retained by MRCA and implemented to ensure that any previously unknown archaeological site areas, features, or artifact concentrations are adequately recorded, evaluated, and, if significant, mitigated. The Construction Monitoring Treatment Plan shall minimally describe the following:

a. Qualifications and organization of monitoring personnel;

b. Procedures for notifying the City of Malibu and/or County of Los Angles and other involved or interested parties in case of a new discovery;

c. Procedures that would be used to record, evaluate, and mitigate new discoveries with a minimum of delay;

d. Procedures that would be followed in case of discovery of disturbed as well as intact human remains;

e. Specifications that all ground disturbances associated with Biological Resources mitigations in the mapped CA-LAN-1915 boundary, and a 100-foot buffer around the boundary, in the proposed Tuna/Las Flores Canyon Mitigation Site shall be monitored by a City- or County-qualified archaeologist and a local Native American representative, funded by the applicant. The monitors shall have the authority to temporarily halt and/or redirect construction in the vicinity of any potentially significant discovery to allow for adequate recordation, evaluation, and mitigation. Evaluation and mitigation could require archaeological testing and data recovery. In the unlikely event that human remains would be encountered, consultation with the most likely Native American descendant pursuant to Public Resources Code section 5097.97 and 5097.98 would apply.

   The Construction Monitoring Treatment Plan shall be prepared by a City of Malibu- or County of Los Angeles-qualified archaeologist, and funded by the applicant. The monitoring program and its results shall be documented in a short letter report within 30 days after completion of all construction activities.

Monitoring: MRCA staff shall verify in the field the presence of the project archaeologist and Native American construction monitor(s). In the event of the identification of any previously unknown archaeological site area, feature, or artifact concentration, the project archaeologist shall be consulted and review and approve any treatment plan for evaluating the significance of the find and determining appropriate mitigations.

MM CR-9: In the unlikely event that potentially significant archaeological resources are encountered during ground disturbances associated with implementation of proposed Biological Resources mitigation outside of the 30.5 meter (100 foot) buffer around recorded archaeological site boundaries, ground disturbances shall be temporarily halted, and the significance of the resources shall be

evaluated by a City of Malibu- or County of Los Angeles-qualified archaeologist and a local Native American representative during a Phase 2 archaeological investigation consistent with the City of Malibu Local Coastal Program Local Implementation Plan, Chapter 11, *Archaeological/Cultural Resources* guidelines. If the resource is determined to be significant, a Phase 3 data recovery mitigation program shall be completed consistent with the City of Malibu Local Coastal Program Local Implementation Plan, Chapter 11, *Archaeological/Cultural Resources* guidelines.

Plan Requirements and Timing: The above mitigation shall be identified on all grading, construction, and restoration plans and shall be faithfully implemented during earth disturbance activities.

Monitoring: MRCA staff shall instruct construction workers on the implementation of this condition in advance of construction. In the event of the identification of any previously unknown archaeological site area, feature, or artifact concentration, the project paleontologist shall be consulted and review and approve any treatment plan for evaluating the significance of the find and determining appropriate mitigations.

Residual Impacts

With implementation of **MM CR-1.1, MM CR-1.2, MM CR-1.3, MM CR-4, MM CR-6, MM CR-7.1, MM CR-7.2, MM CR-7.3, MM CR-8.1, MM CR-8.2,** and **MM CR-9**, potential impacts to cultural resources associated with implementation of the Modified Redesign Alternative would be considered ***less than significant (Class II)***.

Analysis of Impacts Post-Mitigation

The general discussion of potential cultural resource impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.5.3 Cumulative Impacts

The general discussion of cumulative cultural resource impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.5.4 Comparative Analysis

The overall impact level of the Modified Redesign Alternative on cultural resources would be considered *potentially significant, but mitigable* (*Class II*). ***The Modified Redesigned Alternative would likely have less impact on cultural resources relative to the proposed project.*** Under this alternative the number of campsites and parking spaces has been reduced such that the archeologically sensitive area potentially subject to disturbance has been reduced. Therefore, the potential to impact cultural resources has been reduced under this alternative.

3.6 Fire Hazards

3.6.1 Setting

The setting for this alternative section would be similar to that which was identified within Section 5.16, *Fire Hazards*, of the Draft EIR.

3.6.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would be similar to that which was identified within Section 5.6, *Fire Hazards*, of the Draft EIR.

Project Impacts

The Modified Redesign Alternative would reduce the number of proposed camping sites, parking spaces, and public outreach programs, as compared to the Proposed Plan, which would tend to decrease the intensity level of park activity, resulting in fewer people potentially being exposed to risks from wildfire hazards. The campsites would be mostly clustered at Corral Canyon Park and the Malibu Bluffs Conservancy Property in close proximity to PCH. A Master FPP and Focus (park specific) FPPs have been prepared for the Modified Redesign Alternative (see *Appendix MRA-5*). The FPPs include the following revisions (from that which was identified for the Proposed Plan) resulting in greater fire safety.

- Prohibition on all flames.
- Provision of all-weather outlets at each cook station for the use of approved electrical cooking devices.
- Ignition resistant/ember protection structural retrofits to buildings at Ramirez Canyon Park, if required.
- Interior sprinklers in all existing RCP buildings.
- Bridge replacement over Ramirez Canyon Creek to safely support 75,000 pound fire apparatus.
- Permanent on-site Park Administration/Employee Quarters at Corral Canyon Park and Malibu Bluffs to increase presence of wildland fire-trained employees(s) and/or camp host(s) during the times when camping is permitted.
- Increased fuel modification/vegetation management buffer widths around proposed facilities.

- Relocation of the "optional" emergency fire shelters to camp areas (see *Figure 10* in *Appendix TM-5*).
- Standard and wildland fire hydrants at each park (see *Appendix MRA-3*).
- Additional fire apparatus provided at all camp facilities (e.g., portable and air-powered quick attack firefighting system and portable self-contained fire extinguisher units).

The FPPs also include additional measures/programs (e.g., uniform sign program, We Tip program) to further reduce the potential ignition sources in the Plan area.

The Modified Redesigned Alternative (MRA) FPP contained in *Appendix MRA-5* provides detailed analysis of the Modified Redesign Alternative for each of the park areas, the Modified Redesign Plan's potential risk for wildfire, and its impact on the fire response capabilities. The MRA FPP provides a redundant layering of prevention, protection, suppression and pre-planning methods and measures that have been proven to reduce fire risk. The combined fire protection system designed for the Modified Redesign Alternative includes fuel reduction/treatment, enhancement and maintenance of ingress/egress routes, park and trail access control, options for emergency relocation and contingency sheltering areas, and restriction of open flames in all Park areas, amongst others. The FPP is designed to ensure that fire hazard impacts associated with the Modified Redesign Alternative are less than significant, as well as to address community concerns.

Ramirez Canyon Park

Existing RCP structures will be retrofitted for ignition resistance/ember protection, if required, and fitted with interior fire sprinklers. Two of these structures, Ranger/Maintenance Supervisor's residence (Phase 1) and Peach House (Phase 2) have been identified as on-site fire shelters for last resort refuge (for more detail, see *Appendix MRA-5*) and will be retrofitted to California Building Code, Chapter 7A standards for ignition resistance, including roofs, vents, exterior walls, windows, doors, and appendages, amongst others. In addition, the proposed optional emergency fire shelter located at the terminus of Murphy Way (see *Figure 10* in *Appendix MRA-5*) will meet or exceed the requirements of the existing building and fire codes.

Ramirez Canyon Park includes existing structures that will remain with the project. Therefore, fire flow for this Park facility will meet stricter requirements for effective structure protection and fire suppression. Subsequent consultation with District staff (Greg Even and Kirk Allen) on July 21, 2010 and July 23, 2010 confirmed and clarified that the fire flow data contained in the Draft EIR, particularly for Ramirez Canyon Park

was accurate. The flow tests for the hydrants in proximity to Ramirez Canyon Park were conducted within the last few years (3/4/2009, 9/8/2008, and 5/24/2007), and no mains have been replaced that would change flow capacities in this area. It was also clarified that due to elevation changes and storage capacity in the area, flow rates are subject to pressure variation as well as fluctuations in sustained duration of a particular water pressure. However, according to District staff, under normal operation in the Ramirez Canyon area, the 500,000 gallon storage tank providing gravity storage to this pressure zone would have 350,000 gallons available (minus domestic use) for fire flow purposes, and at a fire flow rate of 2,500 gpm at 20 psi, the duration of fire flow would be 140 minutes, which exceeds the minimum LACFD fire flow requirements for rural areas susceptible to wildfire. The achievable flow within RCP is expected to be at least 1,500 gallons per minute at 20 psi residual and the duration of at least 2 hours is based on the 500,000 gallon reservoir serving the area, minus domestic use, resulting in 350,000 gallons available for fire flow. This is considered adequate given that the structures at RCP will be fitted with interior sprinklers.

Escondido Canyon Park/Latigo Trailhead

The proposed project analyzed in the DEIR included relatively high intensity uses at Escondido Canyon Park and Latigo Trailhead compared to the Modified Redesign Alternative. Among the proposed uses in the Proposed Plan are: camping, camp host accommodations, and parking areas at both facilities.

The Modified Redesign Alternative Focused Fire Protection Plan for Escondido Canyon Park and Latigo Trailhead accounts for the removal of all proposed uses including campsites, parking areas, restrooms, and water facilities at Escondido Canyon Park. The only remaining improvements are trail related and provisions for a fire hydrant. Additionally the FPP addresses the lower risk associated with the removal of campsites and related facilities at Latigo Trailhead. Remaining improvements at Latigo Trailhead are day-use picnic areas, parking improvements, and fire hydrants. Along with the removal of the campsites at both facilities, the Modified Redesign Alternative removes the optional emergency fire shelters that were associated with each area. The new day-use facilities at Latigo Trailhead will be within a relatively close proximity to parking areas and roadways. The resulting improvement configuration and use at Latigo Trailhead prompted Los Angeles County Fire Department to indicate that emergency fire shelters would not be necessary. The Modified Redesign Alternative pre-plan, fire restrictions, wildland fire-trained emergency responders and fire fighters, adherence to "Ready, Set, Go," for early off-site relocation, and restrictions that prohibit visitors during weather that is most likely to facilitate ignition and spread of fire, are considered adequate to address fire risk for the proposed uses at these two facilities.

A pressurized water source from water lines (up to 6-inch diameter) will provide water to the proposed standard hydrants at Escondido Canyon Park and Latigo Trailhead. The addition of hydrants at these location provides a reliable water source for fire fighting purposes.

Corral Canyon Park

New structures planned for CCP include non-combustible self contained restrooms, a permanent, modular type camp host accommodation, a fire engine shed and two temporary, prefabricated optional, emergency fire shelters at Camp Area 1, and one temporary, prefabricated optional, emergency fire shelter located on Corral Canyon Road (Trail 13b). The restrooms will meet the code for the intended use. The camp host accommodations will meet fire and building codes for this occupancy type. The fire engine shed will be of steel construction and will meet code. The proposed optional emergency fire shelters will meet or exceed the requirements of the existing building and fire codes. In addition, fuel modification areas will be provided around all new facilities. All restrictions detailed in the Corral Canyon Park focused FPP and the Master FPP (see *Appendix MRA-5*) will be enforced by wildland fire-trained rangers, camp hosts, or staff. Proposed campsites are clustered and located closer to PCH.

For Corral Canyon potable water would be provided via a 6-inch diameter connection to a water main in PCH. This water would be boosted by a small pump station located near the service vehicle access area to serve the camp areas with domestic water. This boosted water will also supply water to the 10,000 gallon storage tank at the top of the knoll above Camp Area 1. The 10,000 gallon storage tank will only be used to provide water to the wildland hydrants. To augment pressure and flow to the wildland hydrants, a stand pipe and Siamese connection are provided near the service vehicle access area. This will allow a pumper truck to take municipal water and pump it into the fire water line that services the wildland hydrants in the camp area. Furthermore, during a telephone conference call meeting on May 12, 2010 with Mr. Jim Bailey (LACFD) and Mr. Greg Even and Mr. Ramy Gindi (District) it was clarified that a proposed 600 square foot habitable structure for a camp host, if sprinklered, would not require specific fire flow requirements due to its small size.

Malibu Bluffs

There are two small permanent Park Administrative/Employee quarters planned for the Bluffs along with self-contained, non-combustible restrooms, two RV camp host accommodations, a metal fire engine shed, and three optional emergency fire shelters. The permanent quarters structures will meet building and fire codes for ignition resistance and all other structures will meet or exceed code, as applicable. Three

optional fire shelters for contingency, last resort, temporary sheltering during wildfire will be provided at the Bluffs, two in Camp Area 3 and one in Camp Area 4. The two permanent Park Administrative/Employee quarters will include interior fire sprinklers. No automatic fire sprinklers are proposed for the other occupancy types, including the RV host accommodations, restrooms, optional emergency fire shelters, or fire engine sheds. In addition, fuel modification areas will be provided around all new facilities. All restrictions detailed in the Bluffs focused FPP and the Master FPP will be enforced by wildland fire-trained rangers, camp hosts, or staff. Proposed campsites are clustered and located closer to PCH.

A 10 in. or 12 in. water mainline would be extended within PCH to provide 4 in. lateral water service to both Parking Area 1 and Parking Area 3. A fire hydrant, supplied via the existing mainline, would be provided within each parking area. In addition, a 10,000 gallon water tank is proposed adjacent to the northern border of Parking Area 1 as an emergency water supply. Five existing fire hydrants along PCH north and northeast of the Bluffs are served by a pressurized water main and are measured at 3,000 gallons per minute (LA County Water Works). Based on these flow, on-site fire flow at provided hydrants is estimated to be at least 1,500 gpm and may be as high as 3,000 gpm.

Average Daily Visitation

A reduction in facilities and programs, estimated average daily visitation would decrease at each park area, resulting in a corresponding decrease in estimated annual emergency call-volume and emergency relocation planning statistics as discussed in the MRA FPP (see *Appendix MRA-5*).

With implementation of the Master FPP and Focused FPPs, impacts from wildfire hazards would remain *less than significant* under the Modified Redesign Alternative.

Mitigation Measures

With implementation of the proposed FPPs, no further mitigation would be required.

Residual Impacts

No mitigations would be required; potential impacts related to fire hazards would remain ***less than significant (Class III).***

Analysis of Impacts Post-Mitigation

The general discussion of potential fire hazard impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.6.3 Cumulative Impacts

The general discussion of potential cumulative fire hazard impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.6.4 Comparative Analysis

With implementation of the FPPs, impacts from wildfire hazards would remain *less than significant (Class III)* under the Modified Redesign Alternative, however, the level of the impact would be reduced slightly from the Proposed Plan due to an overall reduction in park and recreation improvements, including fewer campsites and the elimination of public outreach programs at Escondido Canyon Park, Corral Canyon Park, and Malibu Bluffs, resulting in an anticipated decrease in park visitation and increased fire protection measures contained in the Modified Redesign Alternative FPP. The new alternative includes prohibition on all flames, provision of all-weather outlets at each cook station for the use of approved electrical cooking devices, ignition resistant/ember protection structural retrofits to buildings at Ramirez Canyon Park, if required, interior sprinklers in all existing RCP buildings, bridge replacement over Ramirez Canyon Creek to safely support 75,000 pound fire apparatus, permanent on-site Park Administration/Employee Quarters at Corral Canyon Park and Malibu Bluffs to increase presence of wildland fire-trained employees(s) and/or camp host(s) during the times when camping is permitted, increased fuel modification/vegetation management buffer widths around proposed facilities, relocation of the "optional" emergency fire shelters to camp areas (see *Figure 10* in *Appendix TM-5*), standard and wildland fire hydrants at each park (see *Appendix MRA-3*), and additional fire apparatus provided at all camp facilities (e.g., portable and air-powered quick attack firefighting system and portable self-contained fire extinguisher units). While not required to ensure that fire hazards associated with the alternative are less than significant, these modifications would further reduce the already less than significant fire hazards associated with the Modified Redesign Alternative. ***Therefore, impacts from wildfire hazards would be reduced in comparison to the Proposed Plan.***

3.7 Geology, Soils, and Seismic Hazards

3.7.1 Setting

The setting for this alternative section would not differ from that identified with Section 5.7, *Geology, Soils, and Seismic Hazards*, of the Draft EIR.

3.7.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would not differ from that identified with Section 5.7, *Geology, Soils, and Seismic Hazards*, of the Draft EIR.

Project Impacts

The Modified Redesign Alternative would reduce the number of the proposed camping and parking facilities, thereby lowering the potential for conflicts of proposed improvements with the location of geologic hazards. In particular, proposed development of the Latigo Canyon Trailhead property under the Modified Redesign Alternative would avoid significant risks associated with the landslide area on this property. Because of the absence of proposed elements that would be situated within or immediately adjacent to a mapped landslide on the Latigo Canyon Trailhead property, this alternative would eliminate the Class I geologic impact associated with this property under the Proposed Plan.

In Escondido Canyon Park, no proposed improvements would be sited over or near the Malibu Coast Fault tract. The location of camping and parking facilities under the Modified Redesign Alternative for the remainder of the Parks within the Alternative would still need to take into account the presence of geologic hazards. This alternative would eliminate a significant unavoidable Proposed Plan impact, and have lesser geologic-related impacts than the Proposed Plan. Mitigation measures would still be required under the Modified Redesign Alternative, as impacts would be *potentially significant prior to mitigation.*

Ramirez Canyon Park

Proposed improvements within Ramirez Canyon Park under the Modified Redesign Alternative would be reduced as compared to the Proposed Plan. In short, only two (2) ADA-accessible camp sites within Ramirez Canyon Park would be sited near existing developed areas and proposed parking would be reduced along Kanan Dume Road.

Programs using the existing structures on the property would remain as with the Proposed Plan. Trail alignments 1a and 5a would be developed, along with picnic tables and day-use areas. Overall disturbances to earth materials would be substantially less in this Alternative and would therefore result in lesser geologic-related impacts than the Proposed Plan.

On-site day-use areas and restrooms are located in areas with potential liquefaction hazard. These planned improvements could be damaged or destroyed during a seismically-induced liquefaction episode, leading to potential injury or loss of life for park users. A zone of high seismic potential also encompasses the entire Malibu Coast, including Ramirez Canyon Park. Proposed structural development including restrooms could be damaged or destroyed by ground acceleration (shaking) produced by the regional earthquake fault system, unless properly designed and constructed to withstand such shaking.

The Modified Redesign Alternative would include administrative and public program uses at Ramirez Canyon Park that would employ existing facilities to provide educational opportunities, support unique access opportunities for disabled visitors, accommodate essential administrative park facility support, and allow for limited events and group gatherings typically permitted and accommodated in State Parks. The proposed day-use areas, hiking trails, and continued use of Ramirez Canyon Park for specialized programs may potentially expose people or structures to potentially significant geologic hazards, including seismic and liquefaction hazards.

To ensure avoidance of damage or failure of proposed improvements from liquefaction and seismicity hazards, mitigations **MM G-1.1, MM G-1.2, MM G-3.1 and MM G-4.1** are required.

Escondido Canyon Park

Compared to the Proposed Plan, the Modified Redesign Alternative would result in no impacts at Escondido Canyon Park as no new development or increased use would occur, and no mitigation measures for geologic or seismic induced hazards are required.

Portions of the proposed on-site trail system would however be partially located within an area of identified soil creep. Soil creep may result in the need for increased frequency of maintenance activities for the improved trail system, but would not expose hikers to significant hazards or risks. Trail segments may also be located on collapsible soils, highly erodible soils, or expansive soils which could lead to trail closures or increased maintenance. The Plan conceptual trail design utilized recommendations contained within the *Malibu Parks Public Access Enhancement Plan, Park and Trail Accessibility Design*

Guidelines, prepared by Moore Iacofano Goltsman, Inc. (MIG, June 2006). However, in order to ensure proper final trail design and implementation, mitigation measures **MM G-1.9, MM G-2, MM G-3.6** and **MM G-4.3** are required.

Latigo Canyon Trailhead

Proposed improvements under the Modified Redesign Alternative would be substantially reduced as compared to the Proposed Plan. In short, no camping would be included for Latigo Canyon Trailhead; there would not be a camp host site; no emergency fire shelter would be provided; no water storage tank is proposed; and, restrooms would be reduced to one. Structural development within Escondido Canyon Park under this alternative would be limited to a small parking lot and a separate restroom. Trail alignment 9a would be developed, along with picnic tables situated around the parking lot and along the previously cleared ridge area of the site. Because of the absence of proposed elements that would be situated within or immediately adjacent to a mapped landslide, this alternative would eliminate the Class I geologic impact associated with this property under the Proposed Plan; this alternative would therefore have lesser geologic-related impacts than the Proposed Plan.

The Malibu Coast Fault trace is mapped with an east/west trend just south of the existing trail alignment. No improvements are proposed across or in close proximity to the fault trace. Therefore structural damage from ground rupture is not anticipated. However, the proposed restroom could be damaged or destroyed by ground acceleration (shaking) produced by the regional earthquake fault system, unless properly designed and constructed to withstand such shaking. Mitigation measure **MM G-1.6** is required to address this Class II impact.

Other unstable earth conditions such as compressible soils, easily eroded soils, or lateral spreading of soils must also be addressed via adequate final design. To ensure the avoidance of damage to proposed improvements from geology and soil hazards, mitigation **MM G-3.3** is required.

The site plan for Latigo Canyon under the Modified Redesign Alternative includes a parking lot on the north side of the access road, and a restroom along the northerly extension of a clearing associated with a previous development on this site. These areas of the site do not have landslide risks (read landslide description below), and the proposed parking lot and restroom facility in these areas would therefore have less than significant landslide impacts.

An active landslide feature has been mapped at the Latigo Canyon Trailhead property. The landslide failure plane is estimated to be about 30 feet below the ground surface,

and the scarp (vertical face) associated with the landslide is about 200 feet across at the widest point (Southwestern Engineering Geology, 2009). Portions of the proposed on-site trail system would partially be located within the area of identified landslide (described immediately above). Landslide activity may result in the need to re-construct the trail periodically, unless it is relocated outside of the landslide footprint. The *Geologic Constraints* study (Southwestern Engineering Geology, 2009), concluded that due to the limited and short-term activities on trails, and low level risk associated with the identified type of landslide phenomenon affecting trail alignments, the proposed trail system is an acceptable use within this identified hazard area. Trail segments may also be located on collapsible soils, highly erodible soils, or expansive soils which could lead to trail closures or increased maintenance. The Plan conceptual trail design utilized recommendations contained within the *Malibu Parks Public Access Enhancement Plan, Park and Trail Accessibility Design Guidelines,* prepared by Moore Iacofano Goltsman, Inc. (MIG, June 2006). However, in order to ensure proper final trail design and implementation, mitigation measures **MM G-1.9, MM G-2, MM G-3.6** and **MM G-4.3** are required.

Corral Canyon

The differences between the Modified Redesign Alternative and Proposed Plan can be described as: the proposed camp host parking spot in the existing parking lot would be replaced by employee quarters; the proposed one adjacent restroom would be augmented with a second restroom; the five campsites in the north corral canyon camping area (Site 2) would be replaced by a day use area featuring two picnic tables with no associated restroom; and the south corral canyon camping area (Site 1) would be augmented with 6 camping sites for a total of 17 campsites and an additional restroom. A water line extension between the trail fork leading to Site 1 and Site 2 would be eliminated in this Alternative, as neither campsites or restroom would included at Site 2. Under the Modified Redesign Alternative, two Emergency Fire Shelters are an "Optional" component in the south Corral Canyon Camp area. Corral Camp Trail would still be developed, as with the Proposed Plan. Because of the avoidance of water line extension from the trail fork at Site 1 to the north Corral Canyon Day use area, this alternative would have slightly lesser geologic-related impacts than the Proposed Plan.

Under either the Proposed Plan or the MRA, all proposed structural improvements (including restrooms, employee quarters, fire truck shed, emergency fire shelters, water tank, and camp sites) are proposed to be located outside of the mapped boundaries of areas identified as having landslide potential. So impacts from landsliding on structural improvements would be the same for the Proposed Plan and MRA. For either the Proposed Plan or MRA, hiking trails are proposed to be located at least partially within

mapped landslide area. No structural improvements are proposed to be situated over the mapped fault trace for Malibu Coast Fault under the Proposed Plan or MRA; however, a zone of high seismic potential encompasses the entire Malibu Coast, including Corral Canyon Park. Proposed structural development including employee quarters, restrooms, emergency fire shelters, fire truck shed and water tank could be damaged or destroyed by ground acceleration (shaking) produced by the regional earthquake fault system, unless properly designed and constructed to withstand such shaking. Therefore, final design of these improvements must incorporate site specific ground acceleration information, to be confirmed by an engineering geologist and structural engineer as required under mitigation measure **MM G-1.7**. Given that the MRA would result in an extent of structural development very similar to the Proposed Plan for the Corral Canyon Park, seismicity impacts would be essentially the same between the Proposed Plan and the MRA.

Other unstable earth conditions such as compressible soils, easily eroded soils, or lateral spreading of soils must also be addressed via adequate final design. To ensure the avoidance of damage to proposed improvements from geology and soil hazards, mitigation **MM G-3.4** is required. Given that for Corral Canyon Park the MRA would result in an extent of site improvements very similar to the Proposed Plan, unstable earth conditions impacts would be essentially the same between the Proposed Plan and the MRA

Portions of the proposed on-site trail system would also partially be located within the area of identified landslide (described immediately above). Trail link location and length are substantially similar under the MRA as compared to the Proposed Plan. The *Geologic Constraints* study (Southwestern Engineering Geology, 2009), concluded that due to the limited and short-term activities on trails, and low level risk associated with the identified type of landslide phenomenon affecting trail alignments, the proposed trail system is an acceptable use within this identified hazard area. Trail segments may also be located on collapsible soils, highly erodible soils, or expansive soils which could lead to trail closures or increased maintenance. The Plan conceptual trail design utilized recommendations contained within the *Malibu Parks Public Access Enhancement Plan, Park and Trail Accessibility Design Guidelines,* prepared by Moore Iacofano Goltsman, Inc. (MIG, June 2006). However, in order to ensure proper final trail design and implementation, mitigation measures **MM G-1.9, MM G-2, MM G-3.6** and **MM G-4.3** are required. Because trail location and length remains highly similar for the MRA compared to the Proposed Plan within Corral Canyon Park, geology and soils impacts associated with trails would be equivalent between the MRA and Proposed Plan.

Malibu Bluffs

Proposed improvements for Malibu Bluffs under the Modified Redesign Alternative are similar to the Proposed Plan. In short, the changes for this Alternative from the Proposed Plan can be described as: the two proposed camp host parking spots in Parking Area 1 would be replaced with pre-fabricated employee quarters; one restroom would be augmented adjacent to the employee quarters; an additional 6 camping sites would be included in Camping Area 1; Parking Lot 2 would be eliminated; 5 additional camping sites would be included in Camping Area 2; and Camping Areas 3 and 4 would be clustered together into an overall smaller footprint. Under the Modified Redesign Alternative, two Emergency Fire Shelters are an "Optional" component. On-site trail segments would still be developed, as with the Proposed Plan. Because of the clustering of camping areas, less surface area disturbance would occur, reducing geologic-related impacts, as compared to the Proposed Plan.

Under the MRA, as well as with the Proposed Plan, all proposed structural improvements (including restrooms, employees' quarters, host parking spaces, fire truck shed, emergency fire shelters, water tank, and camp sites) are proposed to be located outside of the mapped boundaries of areas identified as having landslide potential. Hiking trails are proposed to be located at least partially within mapped landslide area, under both the MRA and Proposed Plan. No structural improvements are proposed to be situated over the mapped fault trace for Malibu Coast Fault for either the MRA or Proposed Plan; however, a zone of high seismic potential encompasses the entire Malibu Coast, including Malibu Bluffs Park. Proposed structural development including restrooms, employees' quarters, emergency fire shelters, fire truck shed and water tank could be damaged or destroyed by ground acceleration (shaking) produced by the regional earthquake fault system, unless properly designed and constructed to withstand such shaking. Therefore, final design of these improvements must incorporate site specific ground acceleration information, to be confirmed by an engineering geologist and structural engineer as required under mitigation measure **MM G-1.8**. Given that the MRA would result in an extent of structural development very similar to the Proposed Plan within Malibu Bluffs, seismicity impacts would be essentially the same between the Proposed Plan and the MRA.

Other unstable earth conditions such as compressible soils, easily eroded soils, or lateral spreading of soils must also be addressed via adequate final design. To ensure the avoidance of damage to proposed improvements from geology and soil hazards, mitigation **MM G-3.5** is required. Given that for Malibu Bluffs the MRA would result in an extent of site improvements very similar to the Proposed Plan, unstable earth

conditions impacts would be essentially the same between the Proposed Plan and the MRA.

For both the Proposed Plan and the MRA, portions of the proposed on-site trail system would partially be located within an area identified with ancient landslide. Land sliding in this area has been described as consisting of shallow bedding layers, with limited mass wasting for individual episodes. These shallow bedding plane failures may result in the need for increased frequency of maintenance activities for the improved trail system, but would not expose hikers to significant hazards or risks (Southeastern Engineering Geology, 2009). Trail segments may also be located on collapsible soils, highly erodible soils, or expansive soils which could lead to trail closures or increased maintenance. The Plan conceptual trail design utilized recommendations contained within the *Malibu Parks Public Access Enhancement Plan, Park and Trail Accessibility Design Guidelines,* prepared by Moore Iacofano Goltsman, Inc. (MIG, June 2006). However, in order to ensure proper final trail design and implementation, mitigation measures **MM G-1.9, MM G-2, MM G-3.6** and **MM G-4.3** are required. Because trail location and length remains highly similar for the MRA compared to the Proposed Plan within Malibu Bluffs, geology and soils impacts associated with trails would be equivalent between the MRA and Proposed Plan.

Mitigation Measures

The following mitigation measures, similar (but with applicable revisions) to those required for the Proposed Plan, would be required under the Modified Redesign Alternative:

MM G-1.1 Site-specific geotechnical investigations, including borings and laboratory analysis of soil characteristics, shall be conducted for the following Ramirez Canyon proposed improvements: on-site reconfigured parking areas, off-site Kanan Dume Road parking areas, day-use areas, and new restrooms. The geotechnical investigation shall identify site preparation techniques and/or engineering design specifications to address liquefaction potential of the encountered earth materials. All requirements identified in the geotechnical investigation shall be incorporated into design and construction.

MM G-1.2 A certified engineering geologist (CEG) shall calculate ground acceleration values within Ramirez Canyon Park for the maximum credible earthquake produced by the regional fault system, for use in designing improvements located within Ramirez Canyon Park. A Civil or Structural engineer shall design the proposed improvements upon the

requirements of the California Building Code (CBC) and thereby address the identified ground acceleration in the code prescribed manner, for the following structures: a) new restroom facilities; b) vehicular bridges; c) existing structures proposed for new or expanded public use in Ramirez Canyon Park, under the Plan.

MM G-1.3 No mitigation at Escondido Canyon Park required as compared to the Proposed Plan.

MM G-1.4 No mitigation at Escondido Canyon Park required as compared to the Proposed Plan.

MM G-1.5 No mitigation at Escondido Canyon Park required as compared to the Proposed Plan.

MM G-1.6 A CEG shall calculate ground acceleration values within Latigo Canyon Trailhead property for the maximum credible earthquake produced by the regional fault system, for use in designing any structural improvements located within Latigo Canyon Trailhead property. A Civil or Structural engineer shall design the proposed improvements upon the requirements of the CBC and thereby address the identified ground acceleration in the code prescribed manner, for the following structures: a) self-contained restroom facility; b) water storage tank.

MM G-1.7 A CEG shall calculate ground acceleration values within Corral Canyon Park for the maximum credible earthquake produced by the regional fault system, for use in designing improvements located within Corral Canyon Park. A Civil or Structural engineer shall design the proposed improvements upon the requirements of the CBC and thereby address the identified ground acceleration in the code prescribed manner, for the following structures: a) employee residence; b) self-contained restroom facilities; c) the 10,000 gallon water storage tank; d) fire truck shed.

MM G-1.8 A CEG shall calculate ground acceleration values within Malibu Bluffs Park for the maximum credible earthquake produced by the regional fault system, for use in designing improvements located within Malibu Bluffs Park. A Civil or Structural engineer shall design the proposed improvements upon the requirements of the CBC and thereby address the identified ground acceleration in the code prescribed manner, for the following structures: a) employee residence; b) self-contained restroom

facilities; c) the 10,000 gallon water storage tank; d) fire truck shed; e) vehicular bridges.

MM G-1.9 The final design and construction of trail segments located within areas of landslide potential (soil creep) shall adhere to the Best Practices identified in Malibu Parks Public Access Enhancement Plan, Park and Trail Accessibility Design Guidelines prepared by Moore Iacofano Goltsman, Inc., 2006 (pp 25-35), including but not limited to those for: Trails on Steep Cross Slopes; Trails on Flat Grades; Eroding and Hazardous Trail Edges; Trails on Sandy Soils; and Trails Damaged by Maintenance Vehicle Use.

MM G-2 See MM G-1.9. MM G-2 in the DEIR is the same as G-1.9 and has therefore not been included as a separate mitigation under the MRA.

MM G-3.1 Site-specific soil investigations, including borings and laboratory analysis of soil characteristics, shall be conducted for the following Ramirez Canyon proposed improvements: 14 parking spaces in 3 paved parking areas along Kanan Dume Road, Ramirez Canyon Road bridge replacement, on-site reconfigured parking area, four ADA day-use areas, and four restrooms. The soil investigation shall identify site preparation techniques and/or engineering design specifications to address compression, collapse, or lateral spreading potential of the encountered soil materials.

MM G-3.2 No mitigation at Escondido Canyon Park required, as compared to the Proposed Plan.

MM G-3.3 For any structural improvements (i.e., restroom) proposed to be located north of the access road at Latigo Canyon Trailhead, site-specific soil investigation, including borings and laboratory analysis of soil characteristics, shall be conducted. The soil investigation shall identify site preparation techniques and/or engineering design specifications to address compression, collapse, or lateral spreading potential of the encountered soil materials.

MM G-3.4 Site-specific soil investigations, including borings and laboratory analysis of soil characteristics, shall be conducted for the following Corral Canyon proposed improvements: the two-stall restroom facility at Camp Area 1 and the 10,000 gallon water storage tank. The soil investigation shall identify site preparation techniques and/or engineering design

specifications to address compression, collapse, or lateral spreading potential of the encountered soil materials.

MM G-3.5 Site-specific soil investigations, including borings and laboratory analysis of soil characteristics, shall be conducted for the following Malibu Bluffs Park proposed improvements: two (2) Park Administration/ Employee Quarters buildings, eleven (11) self-contained restroom stalls in eight (8) restroom buildings, a fire truck shed, and two (2) 10,000 gallon water storage tanks. The soil investigation shall identify site preparation techniques and/or engineering design specifications to address compression, collapse, or lateral spreading potential of the encountered soil materials.

MM G-3.6 See MM G-1.9. MM G-6 in the DEIR is the same as G-1.9 and has therefore not been included as a separate mitigation under the MRA.

MM G-4.1 Site-specific geotechnical investigation, including borings and laboratory analysis of soil characteristics, shall be conducted for the segments of Ramirez Canyon Road and Delaplane Road proposed to be widened under the Plan. The geotechnical investigation shall identify site preparation techniques and/or engineering design specifications to address encountered expansive soil materials.

MM G-4.2 No mitigation at Escondido Canyon Park required.

MM G-4.3 See MM G-1.9. MM G-4.3 in the DEIR is the same as G-1.9 and has therefore not been included as a separate mitigation under the MRA.

Residual Impacts

With implementation of **MM G-1.1, MM G-1.2, MM G-1.6, MM G-1.7, MM G-1.8, MM G-1.9, MM G-2, MM G-3.1, MM G-3.3, MM G-3.4, MM G-3.5, MM G-3.6, MM G-4.1,** and **MM G-4.3**, as identified above, potential impacts related to geology, soils, and seismic hazards would be considered ***less than significant (Class II)***.

Analysis of Impacts Post-Mitigation

The general discussion of potential geology, soils, and seismic hazards/ impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.7.3 Cumulative Impacts

The general discussion of cumulative geology, soils, and seismic hazards/ impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.7.4 Comparative Analysis

The overall impact level of the Modified Redesign Alternative related to geology, soils, and seismic hazards would be considered *potentially significant, but mitigable* (*Class II)*. The Proposed Plan had Class I significant and unavoidable impacts. The MRA does not result in any Class I significant and unavoidable geology, soils, or seismic hazard impacts. ***Consequently, the overall impact level of the Modified Redesign Alternative from geology, soils, and seismic hazard would be considered substantially less than the Proposed Plan.***

3.8 Global Climate Change

3.8.1 Setting

The setting for this alternative section would not differ from that identified with Section 5.8, *Global Climate Change*, of the Draft EIR.

3.8.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would be similar to that identified with Section 5.8, *Global Climate Change*, of the Draft EIR.

Cumulative Project Impacts

When compared to the Proposed Plan, the Modified Redesign Alternative air emissions contributing to global climate change would be directly reduced as a result of decreased vehicular trips associated with fewer campsites and parking spaces, as described within the Air Quality alternative analysis above. Table 3.8-1 presents estimated operational GHG emissions generated under implementation of the Modified Redesign Alternative; estimated GHG emissions for the Proposed Plan are also presented for comparative purposes.

Table 3.8-1
Modified Redesign Alternative Estimated Operational GHG Emissions[a]

	CO_2 lbs/year	CO_2E MTons/year
Proposed Plan	7,790,903	3,720
Modified Redesign Alternative	5,001,633	2,388
Comparison	***-2,789,270***	***-1,332***

Source: URBEMIS 2007. See *Appendix TM-7* for complete results.
[a] Future traffic for Ramirez Canyon Park is based on total allowable trips (80 total ADT)
Notes: Lbs/year = pounds per year; Mtons/year = metric tons per year; 1 metric ton = 2,204.623 lbs
(-): reduced GHG impacts

While all sources of GHG emissions contribute to some extent to global climate change, similar to the proposed Plan, the Modified Redesign Alternative would not likely impede or conflict with the State's ability to achieve the goals of AB 32 for the reasons discussed within the Draft EIR, Section 5.8, *Global Climate Change*. Therefore, the Modified Redesign Alternative would not result in a cumulatively considerable contribution to global climate change; associated impacts would be *less than significant*.

Mitigation Measures

No mitigation measures required for the Proposed Plan. No additional mitigation measures would be required.

Residual Impacts

No mitigations would be required; potential impacts to Global Climate Change would remain ***less than significant (Class III)***.

Analysis of Impacts Post-Mitigation

The general discussion of potential Global Climate Change impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.8.3 Comparative Analysis

This Alternative would result in a reduction of approximately 1,332 CO2E MTons/year compared to the Proposed Plan. As such, the Modified Redesign Alternative contributions to global climate change would be 36 percent less than the Proposed Plan. The overall impact level of the Modified Redesign Project Alternative on Global Climate Change would be considered *less than significant (Class III)* (similar to the Proposed Plan). It should be noted that vehicular-generated GHG emissions would be reduced compared to the Proposed Plan due to an expected decrease in visitation in the Plan area, and thus, reduction in vehicular-generated greenhouse gas pollutant emissions. ***Therefore, impacts on Global Climate Change would be less than those associated with the Proposed Plan.***

3.9 Hazardous Materials

3.9.1 Setting

The setting for this alternative section would not differ from that identified with Section 5.9, *Hazardous Materials*, of the Draft EIR.

3.9.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would not differ from that identified with Section 5.9, *Hazardous Materials*, of the Draft EIR.

Project Impacts

Other than the Latigo Canyon Trailhead property, the potential for hazardous materials contamination to affect MRCA park properties in the Plan was found to be very low. For these parks, a reduction in the number of parking spaces and camp sites would not decrease the already very low potential for exposure of park visitors to environmental contamination from hazardous materials.

The Latigo Canyon Trailhead includes evidence of debris piles, which could potentially contain contamination. Under the Modified Redesign Alternative, while camp sites would be eliminated (compared to the Proposed Plan) the Latigo Canyon property would be developed with parking spaces, and would accommodate trail users and day use/ picnicking. Since hikers and picnickers would continue to be on-site (albeit for day-time use rather than overnight) under the MRA, the exposure potential to soil contamination would be very similar. Therefore, the Modified Redesign Alternative would not result in a substantial difference in the potential for park users to be exposed to environmental contamination as compared to the Proposed Plan; impacts would *be potentially significant.*

Ramirez Canyon Park

Proposed improvements within Ramirez Canyon Park under the Modified Redesign Alternative would be reduced as compared to the Proposed Plan. Improvements to or use of Ramirez Canyon Park would not require the use, storage, or transport of substantial volumes of hazardous materials, given the recreational nature of the proposal, similar to the Proposed Plan Further, while construction activities would involve minor volumes of hazardous materials such as vehicle fuels, oils, and other vehicle maintenance fluids, all hazardous materials encountered or used during

construction and grading/excavation activities would be required to be handled in accordance with all applicable local, state, and federal regulations, which includes disposal of hazardous materials at a facility licensed to accept such waste. Consequently, *less than significant* hazardous materials impacts identified for Ramirez Canyon Park under the Proposed Plan would be further minimized under the Modified Redesign Alternative due to less extensive construction activity. No mitigation is required.

Escondido Canyon Park

Proposed Escondido Canyon Park improvements under the Modified Redesign Alternative would be substantially reduced as compared to the Proposed Plan as no new development or increased use would occur. Consequently, *less than significant* hazardous materials impacts identified for Escondido Canyon Park under the Proposed Plan would be eliminated entirely under the Modified Redesign Alternative, and no mitigation is required.

Latigo Canyon Trailhead

Proposed improvements under the Modified Redesign Alternative would be substantially reduced at this location, as compared to the Proposed Plan. Latigo Canyon Trailhead is a vacant and disturbed area that contains some remnants of the former residential site improvements, as well as several piles of soil from former occupation of the site or unauthorized dumping. A physical inspection of the site did not reveal any evidence of trash debris, particularly commercial and/or industrial type products onsite that would be considered hazardous. The construction of the trail, restroom, and parking area would include limited grading, some excavation and cut and fill work prior to construction of the improvements, which may disturb and/ or expose soils of unknown origin and/or remnants of the former on-site residence, which may contain contaminants. The volume of excavation under the MRA would be reduced compared to the Proposed Plan, thereby lessening the potential to disturb possibly contaminated soils. Consequently, the Modified Redesign Alternative would have similar, but marginally less, ***potentially significant*** hazardous materials impacts as identified for the Proposed Plan during construction. Mitigation measures **HAZ-2.1** and **HAZ-2.2** would be required.

Corral Canyon

Proposed improvements under the Modified Redesign Alternative would be similar to the Proposed Plan, Overall construction activity and use intensity for the property would be comparable to that described for the Proposed Plan; therefore, the *less than*

significant hazardous materials impacts identified for Corral Canyon Park under the Proposed Plan would be equivalent under the Modified Redesign Alternative and no mitigation is required.

Malibu Bluffs

Proposed improvements for Malibu Bluffs under the Modified Redesign Alternative would be similar to the Proposed Plan. Development or use of Malibu Bluffs would not require the use, storage, or transport of substantial volumes of hazardous materials. Further, minor volumes of hazardous materials such as vehicle fuels, oils, and other vehicle maintenance fluids, encountered or used during construction and grading/excavation activities would be required to be handled in accordance with all applicable local, state, and federal regulations. Accordingly, *less than significant* hazardous materials impacts identified for Malibu Bluffs under the Proposed Plan would be equivalent under the Modified Redesign Alternative. No mitigation is required.

Mitigation Measures

Mitigation measures required for the Proposed Plan would also be required under the Modified Redesign Alternative. No additional mitigation measures would be required.

MM HAZ-2.1 Prior to grading at the Latigo Trailhead, MRCA shall test on-site soils for metals, total petroleum hydrocarbons, volatile organic compounds, and pesticides. Any soils found with actionable levels of hazardous materials shall be excavated and disposed, or treated in situ (in place), in accordance with applicable regulatory requirements and approved by applicable governmental authorities.

Plan Requirement and Timing: Physical sampling and laboratory analysis, and any recommendations resulting therefrom, shall be prepared and submitted to MRCA for review and approval prior soil disturbance activity.

Monitoring: Prior to grading, MRCA shall review soil test sample results and shall implement any recommendations for required remediation.

MM HAZ-2.2 At the Latigo Trailhead, a monitor trained in identification of contaminated soil shall be present for at least part of each day during site grading excavations, to determine if previously

unidentified contaminated soil has been encountered. The monitor shall make this determination based on visual signs of discolored soil, olfactory indications, dialogue with grading contractors, and/or positive readings on a photoionization detector or organic vapor analyzer. The monitor shall be current with respect to Cal OSHA 40-hour training for hazardous materials. If during grading activities new and/or additional contamination is discovered, grading within such area shall be temporarily halted and redirected around the areas until the appropriate evaluation and remediation measures are implemented in accordance with applicable regulatory requirements so as to render them suitable for grading activities to resume.

Plan Requirements and Timing: This requirement shall be identified as a note on the grading plan for each phase.

Monitoring: MRCA shall inspect during construction to verify compliance with this requirement.

MM HAZ-4 Prior to grading at the King Gillette Ranch Mitigation Site, MRCA shall test on-site soils within the proposed mitigation area for elevated pesticide concentrations. Any soils found with actionable levels of hazardous materials shall be excavated and disposed, or treated in situ (in place), in accordance with applicable regulatory requirements and approved by applicable governmental authorities.

Plan Requirements and Timing: Physical sampling and laboratory analysis, and any recommendations resulting therefrom, shall be prepared and submitted to MRCA for review and approval prior soil disturbance activity.

Monitoring: Prior to grading, MRCA shall review soil test sample results and shall implement any recommendations for required remediation.

Residual Impacts

With implementation of **MM HAZ-2.1, MM HAZ-2.2,** and **MM HAZ-4**, potential impacts to hazardous materials would be considered ***less than significant (Class II)***.

Analysis of Impacts Post-Mitigation

The general discussion of potential hazardous material impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.9.3 Cumulative Impacts

The general discussion of cumulative hazardous material impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.9.4 Comparative Analysis

The Modified Redesigned Alternative would have similar, though marginally less, hazardous materials impacts during construction, as compared to the proposed Plan. ***Consequently, the Modified Redesign Alternative is considered to have equivalent hazardous materials impacts to the Proposed Plan.***

3.10 Hydrology, Drainage, and Water Quality

3.10.1 Setting

The setting for this alternative section would not differ from that identified with Section 5.10, *Hydrology, Drainage, and Water Quality*, of the Draft EIR. With the exception that the Preliminary Hydrology/Bridge Crossing Report (Penfield & Smith 2009) inadvertently omitted a graphic illustrating the 50-year burned and bulk inundation limit for Ramirez Canyon. The missing Figure BB-1 addressing the 50-year burned and bulked inundation limits of Ramirez Canyon is provided in Appendix MRA-13 for reference.

3.10.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would be similar to that which was identified within Section 5.10, *Hydrology, Drainage, and Water Quality*, of the Draft EIR.

Project Impacts

Under the Modified Redesign Alternative, campsites would be reduced by 24% and the number of parking spaces would be reduced by 22%. The reduction in impacts would be commensurate, with some notable reductions in campsites within certain park properties and a reduction in the number of parking lots. The sections below detail the shift in impacts for the Modified Redesign Alternative as compared to the Proposed Project.

Reduction in the overall construction would reduce short-term construction related impacts such as potential sedimentation and erosion; however, mitigation would still be required.

The decrease in the number of campsite would also decrease potential impacts to water quality associated with restrooms, campers and pet/horse waste; nonetheless, mitigation would still be required. Finally, impervious surfaces associated primarily with parking and driveway access would decrease, however, mitigation by means of bio-filters and direction of flow to vegetated areas would still be required. Therefore, under the Modified Redesign Alternative, impacts to hydrology, drainage and water quality would be considered *potentially significant*, but to a lesser extent than the proposed Plan.

Short-Term Construction-Related Drainage Impacts

Construction of the various Plan facilities would require grading and excavation, along with disturbance of soils and vegetation. Stormwater runoff could cause soil erosion of disturbed sites and transport other construction-related contaminants (e.g., fuels, oil, concrete, paint) to nearby receiving waters and thereby impair water quality and aquatic organisms and their habitats. The extent of the impacts would depends on soil erosion potential, type of construction practice, extent of disturbed area, timing of precipitation events, topography, and proximity to drainage channels. With a reduction in the number of parking spaces and camp sites under the Modified Redesign Alternative, overall construction-related impacts upon stormwater run-off would be marginally reduced as compared to the Proposed Plan. However, this impact would still be considered *potentially significant* (Class II) under the Modified Redesign Alternative. Consequently mitigations **MM HYD-1.1** and **MM HYD-1.2** would be required in relation to Plan construction activities throughout the Plan area.

Drainage Impacts (Operations)

According to the Penfield & Smith preliminary drainage analysis (Penfield & Smith, 2009), Plan implementation would not substantially alter the existing drainage pattern of any of the Plan sites, nor would Plan implementation substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. In general, the Modified Redesign Alternative would further reduce alterations to existing run-off rates compared to the proposed Project via: no new parking lot would be developed within Escondido Canyon Park; camp sites would be reduced within Ramirez Canyon and removed entirely within Escondido Canyon and the Latigo Trailhead property.

The Modified Redesign Alternative would continue to include a creek enhancement plan at Ramirez Canyon Park, which would restore the channelized portions of the creek there to a more natural condition. Penfield & Smith's 2009 drainage analysis determined that the capacity of the creek would be increased at this location (restored to its original, natural state), but it would not substantially change relative to drainage patterns or result in new flood concerns.

Proposed campsite parking areas would be improved with asphalt concrete (AC). While impervious area would be increased, the amount of runoff would be minimal. Biostrips would generally run the lengths of the southern (downslope) portions of each parking area, and parking areas would be contoured to direct all potential flow from impervious areas to pervious areas of the Plan site. Rip-rap and other drainage control methods would be employed to reduce flow velocity and thereby aid infiltration into the ground; drainage patterns would not be significantly altered from the existing condition. All

campsite areas throughout the plan area would be surrounded by a vegetated buffer and gently graded so runoff, which would be minimal, would be directed to adjacent vegetation. Low-profile retaining walls (1 to 3 feet in height) would also be constructed along portions of the campsites to enhance slope stability and minimize potential erosion. Gravel or rock filled drainage sumps would be used at the each camping area to address potential impacts associated with potable water spigots.

The proposed trail system improvements include several hiking and equestrian trails throughout the Plan Area. Trail construction would be designed consistent with the *Park and Trail Accessibility Design Guidelines* document prepared by Moore Iacofano Goltsman, Inc. for the Plan area. These guidelines provide specific trail design measures to ensure resource protection through appropriate drainage and control measures. There is also a design standard that requires adherence to trail construction in accordance with accepted current design practice for mountain trail design including addressing drainage, erosion control and dissipation.

As with the Proposed Plan, implementation of the Modified Redesign Alternative would result in *less than significant* impacts on runoff, drainage and flooding. Because of the smaller total area covered by impervious surfaces under this Alternative, the less than significant impacts would be incrementally reduced.

Flooding Impacts

50-year storm events in the project area are short and infrequent events, and are typically forecast well ahead of time. For the Proposed Plan, potential inundation of campsites and portions of trail areas adjacent to lower Escondido Canyon, Latigo Trailhead, and Corral Canyon Park were identified to occur during a 50-year storm. Under the Modified Redesign Alternative, no campsites would be located in Escondido Canyon Park or at Latigo Trailhead, decreasing this potential impact. In addition, as improvements adjacent to waterways would be considered low impact through incorporation of low-impact development design features, potential impacts to drainage, flooding or runoff would be less than significant.

Creek crossings at camp areas within Ramirez Canyon, Corral Canyon, and the Conservancy-owned Malibu Bluffs, as well as along trails within Escondido Canyon and Latigo Trailhead would also be rendered temporarily inaccessible during a 50-year storm event. Human injury and loss of life, however, would not reasonably occur as sufficient warning would be provided to ensure all affected park facilities would be evacuated well in advance of the storm. Although damage to proposed improvements could occur during flooding, any minor proposed improvements within creek areas would be easily restored to a pre-storm condition after an event. However, in order to ensure the

avoidance of injury or loss of life, and to ensure minimization of damage to improvements, mitigation measures **MM HYD-3.1** through **MM HYD-3.3** are required, which addresses park closures when heavy precipitation is forecasted.

The proposed creek restoration efforts at Ramirez Canyon Park would also be beneficial. The creek enhancement plan includes removing select existing gabions and installing pervious boulder berms and/or log deflection structures throughout the creek to control stream degradation; creating areas of overbank enhancement in two areas (by the existing tennis court and at the southerly portion of the park) by removing artificial creek wall linings, grading back the slopes, constructing rock toe protection, installing retaining walls, and planting native plants; and planting of native plant species and removing non-native plants throughout the creek. With the implementation of the plan, impacts to flood control would be beneficial.

Mudflow Inundation

The Plan Area is located in a rugged, heavily vegetated area of the Malibu and the County of Los Angeles where hillsides are steep and vulnerable to wild land fires. Should a wild land fire occur, vegetation that normally retains soils and minimizes erosion and sedimentation potential would be compromised. Subsequent heavy rains would potentially result in debris laden runoff and mudflow. There is no debris control devices located in the watersheds of the Plan Area.

Some creek crossings throughout the park, in addition to a few of the camp sites in specific parks, would be subject to inundation during a heavy storm event as described above. In addition, all of the sub-watersheds would be subject to mudflow after a fire and a heavy storm event. The extent of mudflow would depend on the amount of vegetation lost and intensity of the storm. Moreover, in the case of a storm event, forecasts would be made well in advance and there would be ample time to vacate and close the Plan sites. Depending on the size of the runoff event, there would likely be a need for clean-up and maintenance for restoration of the pre-storm event conditions. Further, adherence to the Plan's Hazard Policies 1 and 2 that require park improvements be located and constructed to minimize potential risks to life and property. In order to avoid significant damage from mudflow events to the maximum extent feasible, and to ensure conformance with the findings of a geotechnical report's recommendations and hydrology report's recommendations, mitigation is necessary to address an otherwise *potentially significant impact.* Mitigation measures **MM HYD-4.1** and **MM HYD-4.2** are required for implementation of plan improvements and for long-term operation of the new facilities.

Water Quality

The Plan does involve the creation of impervious surfaces through the development of new and/or expanded vehicular access and parking facilities. As with all vehicular access and parking areas, there is a potential to introduce typical urban contaminants, such as motor oil, gasoline, and rubber particles (from tire wear) into the environment. Run-off from rain would likely mix with some of these urban constituents and would flow from the on-site impervious surfaces to on- and off-site pervious areas. The proposed surface drainage systems for each of the improvement areas include various gravel sumps, rip-rap on channels where appropriate, direction of runoff to vegetated areas, etc. Bioswales, biofilters, and vegetated filters are capable of providing partial natural filtration; surface water moving slowly through these areas would receive some treatment via absorption and natural breakdown of certain types of pollutants, especially those associated with urban runoff such as hydrocarbons.

In recognition of the importance of carefully controlling trash (as exemplified by the adopted TMDL governing trash and debris in Malibu Creek and Santa Monica Bay which are adjacent to the Plan Area), prevention of trash transport off-site would be accomplished via trash collection by MRCA at each park location on a weekly basis, and further, on as-needed basis during times of heavier park use. Trash and recycling would be collected by MRCA staff, utilizing pick-up trucks and/or small Cushman-style utility vehicles. Vehicular access would be via existing/proposed roads and trails. In addition, MRCA will pick up as-needed trash at trailheads, within campsites, and along trails (during patrols or maintenance/monitoring) by hand or by hand tool. Pet and horse excrement could impact Plan streams without appropriate mitigation. While none of the water bodies within the Plan Area are currently listed as impaired in the Los Angeles RWQCB 2008 303(d)/305(b) Integrated Report, bacteria is identified as a contaminant in Malibu Creek and on Santa Monica Beach. Therefore, sources which could contribute to elevated bacterial levels in local streams are recognized as an issue. The potential for elevated bacterial levels in Plan stream resulting from pet and horse wastes would be *potentially significant*. Mitigation measure **MM HYD-8** is required to address this impact.

To prevent overflow of self-contained restroom units and to maintain sanitary conditions, restrooms will be cleaned and stocked five to seven days per week, would be serviced (i.e., washed-out) approximately three times a month, and would be pumped monthly. Only approved biodegradable restroom cleaning materials, including soaps and cleansers, would be used. Water would drain to a sump near the restroom entrance. Back Flow Prevention Devices (BFPD) would be attached to proposed fire hydrants to prevent backflow and protect water supplies from being contaminated.

Additionally, the recommendation of the hydrology report indicated that critical facilities, such as restrooms, be maintained outside of the 50-year burned-and-bulked inundation limits or raised above the flooding elevation in areas adjacent to creeks.

With respect to existing septic and sewer treatment systems at Ramirez Canyon Park, portions of the systems are located within the 50-year burned-and-bulked/ 100-year flood zone. Septic holding tanks, however, are air- and water-tight. In the event of a flood event, the lids of these tanks are bolted shut, which ensures that there would be absolutely no leakage whatsoever, such that adverse water quality impacts would be avoided (Bravin, 2009). Nonetheless, water quality will be monitored per Ramirez Water Quality Policy 8. The policy provides yet another safeguard against potential adverse water quality impacts. Beyond the air and water tight tanks and implementation of Measure 8, the project is required to maintain in Ramirez Canyon the existing state of the art treatment system with a lift station and treatment facility. While these facilities would be adjacent to the creek corridor, they would be outside of the 100-year flood zone, thus impacts to water quality would be *less than significant*.

At Plan campsites, restrooms would be equipped with gravel filled drainage sumps, camping areas would also contain small gravel drainage sumps and parking areas would include biofilters, bioswales and direction of flow to vegetated buffer areas through gentle grading. All of the filtration interventions and methods incorporated into the proposed project would be highly effective in reducing sediments and associated pollutants such as hydrocarbons, metals, pathogens and nutrients. Back Flow Prevention Devices (BFPD) would be attached to proposed fire hydrants to prevent backflow and protect water supplies from being contaminated. Associated water quality impacts would be *less than significant*.

Based upon adherence to Water Quality policies and Implementation Measures, recommendations included in the hydrology analysis prepared for the Proposed Plan, the preparation and adherence to a SWPPP as well as the implementation of all BMPs, directing drainage to adjacent vegetated or gravel areas for filtering, the project would not create substantial erosion or siltation on- or off-site. Impacts therefore would be *less than significant.*

Mitigation Measures

Mitigation measures required for the Proposed Plan would also be required under the Modified Redesign Alternative. No additional mitigation measures would be required.

MM HYD-1.1 Before onset of any construction activities, MRCA or its agent shall obtain coverage under the NPDES General Construction

Permit. MRCA shall be responsible for ensuring that construction activities comply with the conditions in this permit, including development of a SWPPP, implementation of BMPs identified in the SWPPP, and monitoring to ensure that effects on water quality are minimized. As part of this process, MRCA or its agent shall implement multiple erosion and sediment control BMPs in areas with potential to drain to surface water. Guidelines established in the County's SUSMP or equivalent guidelines shall be followed in selecting, implementing, and monitoring BMPs for construction activities. The following BMPs shall be implemented during the construction period

1. All storm drains, drainage patterns, and creeks located near the construction site prior to construction shall be identified on grading, construction, and restoration plans to ensure that all subcontractors are aware of their location and prevent such as equipment petroleum product pollutants from entering them;
2. Washing of concrete trucks, paint, equipment, or similar activities shall occur only in areas where polluted water and materials can be contained for subsequent removal from the site. Wash water shall not be discharged to the storm drains, street, drainage ditches, creeks, or wetlands.
3. Areas designated for washing functions shall be at least 100 feet from any storm drain, water body, or sensitive biological resources. The location(s) of the washout area(s) shall be clearly noted at the construction site with signs; the applicant shall designate a washout area, acceptable to Building and Safety and P&D staff. The washout areas shall be shown on the construction and/or grading and building plans and shall be in place and maintained throughout construction;
4. All chemical storage leaks, spills, and drips shall be immediately cleaned up and disposed of properly;
5. Vehicles and heavy equipment that are leaking fuel, oil, hydraulic fluid or other pollutants shall be immediately contained and either repaired immediately or removed from the site;
6. One or more emergency spill containment kits shall be placed onsite in easily visible locations, and personnel will be trained in proper use and disposal methods;

7. Vehicles and heavy equipment shall be refueled and serviced in one designated site located at least 500 feet from creeks and drainage swales;
8. Temporary storage of construction equipment shall be limited to a 50- by 50-foot area, preferably located along an existing dirt access road, and shall be located at least 100 feet from any water bodies;
9. Dry cleanup methods shall be used whenever possible;
10. Clean site runoff shall not be contaminated with polluted water through the use of berms or ditches to divert surface runoff around the construction site;
11. Exposed stockpiles of soil and other erosive materials shall be covered during the rainy season;
12. Trash cans shall be placed liberally around the site and properly maintained;
13. All subcontractors and laborers shall be educated about proper site maintenance and stormwater pollution control measures through periodic "tailgate" meetings;
14. Roadwork or pavement construction, concrete, asphalt, and seal coat shall be applied during dry weather only; and
15. Storm drains and manholes within the construction area shall be covered during paving or applying seal coat, slurry, fog seal, etc.

Plan Requirement and Timing: This requirement shall be identified as a note on the grading, construction, and restoration plans for each phase.

Monitoring: MRCA shall verify that a notice of intent has been submitted to the State Water Board and a SWPPP has been completed before allowing construction to begin. MRCA or its agent shall perform routine inspections of the construction area to verify that the BMPs specified in the SWPPP are properly implemented and maintained.

MM HYD-1.2 MRCA or its agent shall develop a Spill Prevention Control and Countermeasures Plan (SPCCP) to minimize the potential for and effects from spills of hazardous, toxic, or petroleum substances during construction activities. The SPCCP shall be completed

before any construction activities begin. Implementation of this measure shall comply with state and federal water quality regulations.

Plan Requirement and Timing: This requirement shall be identified as a note on the grading, construction, and restoration plans for each phase and shall be implemented throughout construction.

Monitoring: MRCA shall review and approve the SPCCP before onset of construction activities. MRCA or its agent shall routinely inspect the construction area to verify that the measures specified in the SPCCP are properly implemented and maintained. If a spill is reportable, MRCA shall take action to contact the appropriate safety and cleanup crews to ensure that the SPCCP is followed. A written description of reportable releases must be submitted to the Los Angeles RWQCB.

MM HYD-3.1 When more than 6 inches of rain are predicted within a 24 hour period, campsites, trails and creek crossings shall be closed to any visitation or use of any kind. Any occupied sites shall be vacated. No member of the public shall enter the campsites or shall utilize the creek crossing or trails until all warnings associated with a forecasted storm event have been lifted. No member of the public shall be permitted to enter the campsites or use the creek crossings or trails until all necessary restoration work has been carried out to the satisfaction of the jurisdiction in which the park is located.

Plan Requirement and Timing: The above mitigation shall be integrated into a PWP Park Management Plan.

Monitoring: During operation of the project, MRCA staff shall be responsible for implementing the PWP Park Management Plan.

MM HYD-3.2 Trails shall be maintained outside of the 2-year clear water inundation limits.

Plan Requirement and Timing: The above mitigation shall be integrated into a final construction design.

Monitoring: MRCA staff shall review construction plans and monitor in field for implementation of the final design.

MM HYD-3.3 During final design, rock sizes and/or locations or rocks shall be adjusted from previous crossings to places where there are lower flow velocities; and/or smaller rocks shall be used.

Plan Requirement and Timing: The above mitigation shall be integrated into a final construction design.

Monitoring: MRCA staff shall review construction plans and monitor in field for implementation of the final design.

MM HYD-4.1 Trails shall be maintained outside of the 2-year clear water inundation limits.

Plan Requirement and Timing: The above mitigation shall be integrated into a PWP Park Management Plan.

Monitoring: During operation of the project, MRCA staff shall be responsible for implementing the PWP Park Management Plan.

MM HYD-4.2 See MM HYD-3.2.

MM HYD-8 Plan day use, camping areas, and trails shall be required to implement a pet waste program, which would entail installing pet waste dispensers and bags as well as posting signage in both Spanish and English. MRCA shall be required to refill the dispensers on a routine basis and be required to document the number of bags found abandoned. Signage shall include verbiage addressing the importance of proper disposal of pet waste as well as stating the jurisdictional authority's ordinance section and fines associated with failure to comply with the ordinance. Offenders caught not using the bags shall be fined. If horsewaste is deposited less than 50 feet from the bottom of the low flow channel where a trail crosses a drainage, during patrols and maintenance activities at a frequency of not less than once per week during camping season (approximately April 1 through November 1), MRCA staff will move the waste to a distance greater than 50 feet to allow for natural decomposition away from the drainage course.

Plan Requirement and Timing: The above mitigation shall be integrated into a PWP Park Management Plan.

Monitoring: During operation of the project, MRCA staff shall be responsible for implementing the PWP Park Management Plan.

Residual Impacts

With implementation of **MM HYD-1.1, MM HYD-1.2, MM HYD-3.1, MM HYD-3.2, MM HYD-3.3, MM HYD-4.1, MM HYD-4.2 and MM HYD-8** potential impacts related to hydrology, drainage, and water quality would be considered ***less than significant (Class II)***.

Analysis of Impacts Post-Mitigation

The general discussion of cumulative hazardous material impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.10.3 Cumulative Impacts

The general discussion of cumulative hazardous material impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.10.4 Comparative Analysis

Under the Proposed Plan, all impacts would be potentially *significant, but mitigable (Class II)*. ***Given the overall reduction in campsites and parking areas, the Modified Redesign Alternative would have a lesser impact on hydrology, drainage and water quality than the Proposed Plan.***

3.11 Land Use and Planning

3.11.1 Setting

The setting for this alternative section would not differ from that identified within Section 5.11, *Land Use and Planning*, of the Draft EIR.

3.11.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would be similar to that which was identified within Section 5.11, *Land Use and Planning*, of the Draft EIR.

Project Impacts

Under the Modified Redesign Alternative, proposed park and recreation improvements including camping and parking areas would be redesigned and generally reduced throughout the Plan area, as would proposed special event uses at Ramirez Canyon Park. A reduction in potential land use and resource impacts would be commensurate with the reduced park and recreation improvements and uses. As such, the analysis contained in Section 5.11, *Land Use and Planning*, of the Draft EIR relative to potential impacts associated with physical division of an established community and conflicts with applicable habitat conservation or natural community conservation plans remains applicable to the Modified Redesign Alternative.

A detailed policy consistency analysis for the Proposed Plan is included in Section 4.0, *Consistency with Plans and Policies* of the DEIR which concludes Proposed Plan improvements would potentially conflict with land use plan policies addressing geologic hazards and protection of environmentally sensitive habitat areas adopted for the purpose of avoiding or mitigating an environmental effect, resulting in a *significant and unavoidable impact*. The policy consistency analysis contained in Section 4.0 of the DEIR indicates that Proposed Plan park facility improvements at the Latigo Trailhead property present a potentially significant and unavoidable impact associated with geologic/landslide hazards, inconsistent with Section 30253 of the Coastal Act, and City of Malibu Local Coastal Program Policies 4.2, 4.14, 4.4, and Section 3.4.2.D.11.a. The policy consistency analysis further indicates that implementation of the Proposed Plan would result in minor impacts to sensitive habitats from new development that does not constitute a resource-dependent use, and which is therefore prohibited in environmentally sensitive habitat areas as defined by Section 30240 of the Coastal Act

and City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69. The Proposed Plan improvements and associated impacts generally consist of development encroachment and/or fuel modification requirements for support facilities that are not defined as resource-dependent uses per the Coastal Act or City Local Coastal Program and include: 1) encroachment of parking areas and associated fuel modification proposed on Kanan Dume Road and emergency access road improvements for Via Acero, 2) fuel modification requirements for the Murphy Way (De Butts Terrace) Emergency Fire Shelter, 3) encroachment of parking improvements and fuel modification requirements for the Emergency Fire Shelter proposed at the Latigo Trailhead property, 4) fuel modification requirements for the Corral Canyon Park Emergency Fire Shelters, camp host and fire truck shed improvement area, 5) and encroachment of circulation improvements and fuel modification requirements for the parking/camp host/emergency fire shelter improvement area at Malibu Bluffs (Parking Area 3). Though minor, these facility and fuel modification requirements would result in impacts to environmentally sensitive habitat areas, inconsistent with Section 30240 of the Coastal Act and City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69.

The Modified Redesign Alternative includes park and recreation improvements that would be redesigned and generally reduced in scope throughout the Plan area, and feasible mitigation measures that have been identified within this section of the FEIR to reduce potential environmental impacts to less than significant levels. In addition, a detailed policy consistency analysis for the Modified Redesign Alternative-Public Works Plan included in Appendix MRA-4 incorporates additional analysis based on comments received on the DEIR and the redesigned/reduced scope of improvements. With these Modified Redesign Alternative project elements, land use impacts related to potential conflicts with policies addressing geologic hazards and protection of environmentally sensitive habitat areas, adopted for the purpose of avoiding or mitigating an environmental effect, would be reduced from being significant and unavoidable (Class I), to *potentially significant, but mitigable (Class II) impacts,* as discussed below.

Ramirez Canyon Park

Kanan Dume Parking Areas

The Proposed Plan includes direct development and fuel modification (20 ft.) encroachments into bigpod ceanothus chaparral areas associated with the three Parking Areas along Kanan Dume Road. As a result, these Proposed Plan improvements for Ramirez Canyon Park parking along Kanan Dume Road would potentially conflict with policies addressing protection of environmentally sensitive habitat areas adopted for the

purpose of avoiding or mitigating an environmental effect, resulting in a *significant and unavoidable impact*.

The Modified Redesigned Alternative includes a redesigned and reduced scope of improvements for these parking areas that limits all direct parking area development footprints to within the disturbed, informal parking area footprints that currently exist in these locations. The Modified Redesigned Alternative also reduces fuel modification requirements around the parking areas to 10 ft. consistent with LACFD requirements. Very minor encroachment into bigpod ceanothus chaparral areas would result from the 10 ft. fuel modification requirements associated with Parking Areas 1 and 2. As identified in the policy consistency analysis for the Modified Redesign Alternative-Public Works Plan, which is included in Appendix MRA-4 of the FEIR, these minor parking area fuel modification encroachments would be limited to within an area likely already subject to vegetation management and fuel modification requirements that would typically apply to public roads and/or existing parking areas. City of Malibu Land Use Plan 3.1, ESHA Designation, specifically exempts areas subject to fuel modification activities as follows: "*Existing, legally established agricultural uses, confined animal facilities, and fuel modification areas required by the Los Angeles County Fire Department for existing, legal structures do not meet the definition of ESHA."* As such, although Parking Areas 1 and 2 fuel modification requirements will result in minor encroachments into bigpod ceanothus chaparral vegetation, these affected areas are likely subject to current fuel modification activities and are therefore not considered ESHA under the Malibu LCP or the Coastal Act. As such, the Modified Redesign Alternative would not conflict with Section 30240 of the Coastal Act or City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69. In addition, as the proposed parking areas consist of improvements to an existing and disturbed development footprint, and because there are no other alternative locations which could accommodate the proposed parking improvements and the improvements are located and designed so as not to impact ESHA, with implementation of appropriate mitigation measures identified within this technical memorandum, the Modified Redesigned Alternative parking improvements are consistent with applicable LCP policies relative to ESHA buffers (policies 3.23- 3.30). The Modified Redesign Alternative addresses and eliminates all potential policy conflicts identified in the Draft EIR for the Proposed Plan. As such, potential land use impacts associated with the Modified Redesign Alternative would be reduced to *potentially significant.* Mitigation Measure **MM LUP-2** is required to address this impact.

Via Acero Road Improvements

The Proposed Plan includes direct development encroachments into California Sagebrush / Giant Wild Rye associated with widening and extension of Via Acero. The

policy consistency analysis is included in Section 4.0, *Consistency with Plans and Policies* of the DEIR indicates these road improvements would potentially conflict with policies addressing protection of environmentally sensitive habitat areas adopted for the purpose of avoiding or mitigating an environmental effect, resulting in a *significant and unavoidable impact*.

The Modified Redesigned Alternative Project-Public Works Plan includes a detailed policy consistency analysis which is included in Appendix MRA-4 of the FEIR, which incorporates additional analysis based on comments received on the DEIR. City of Malibu Local Implementation Plan policy 3.4.2.D.11.b.iv. requires the following in connection with the Public Works Plan*: "Opportunities for additional emergency ingress/egress to and from Kanan Dume Road over Via Acero shall be explored, including the potential for feasibly obtaining easements from willing property owners or by eminent domain. Construction of an additional emergency ingress/egress at Ramirez Canyon may occur consistent with all applicable policies and provisions of the LCP. This policy is not intended to limit the use of, or access to, Ramirez Canyon Park via Ramirez Canyon Road.* As identified in the policy consistency analysis for the Modified Redesign Alternative-Public Works Plan, the Conservancy/MRCA are required to pursue options for additional emergency ingress/egress to and from Kanan Dume Road over Via Acero to and from Ramirez Canyon. The certified LCP specifically requires that this project component be explored and, as such, this component of the Modified Redesigned Alternative Project has been appropriately included and analyzed in this technical memorandum. As there appears to be a conflict between the coastal access, recreation, and ESHA protection policies of the Coastal Act and LCP, the Via Acero road improvements may be found consistent with these applicable policies because the proposed road improvements would, on balance, improve conditions for coastal resources subject to LCP policy mandate by improving emergency ingress/egress into Ramirez Canyon and enhancing public access and recreation opportunities at Ramirez Canyon Park. The Modified Redesign Alternative addresses and eliminates all potential policy conflicts identified in the Draft EIR for the Proposed Plan. As such, potential land use impacts associated with the Modified Redesign Alternative would be reduced to *potentially significant.* Mitigation Measure **MM LUP-2** is required to address this impact.

Ramirez Canyon Road Widening

As with the Proposed Plan analyzed in the DEIR, the Modified Redesigned Alternative includes minor road improvements to Ramirez Canyon Road/Delaplane to improve emergency access for the Ramirez Canyon neighborhood. Very minor encroachment into California sycamore-coast live oak and coast live oak areas would result from the Ramirez Canyon Road widening improvements. As identified in the policy consistency

analysis for the Modified Redesign Alternative-Public Works Plan, which is included in Appendix MRA-4 of the FEIR, these minor road widening encroachments would be limited to within disturbed areas already subject to fuel modification requirements associated with surrounding residential uses on both sides of the road. City of Malibu Land Use Plan 3.1, ESHA Designation, specifically exempts areas subject to fuel modification activities as follows: "*Existing, legally established agricultural uses, confined animal facilities, and fuel modification areas required by the Los Angeles County Fire Department for existing, legal structures do not meet the definition of ESHA."* Although the road widening will result in minor encroachment into California sycamore-coast live oak and coast live oak areas, these affected areas are already subject to current fuel modification activities and are, therefore, not considered ESHA under the Malibu LCP or the Coastal Act. As such, the Modified Redesign Alternative would not conflict with Section 30240 of the Coastal Act or City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69. In addition, as the proposed road widening improvements consist of improvements to an existing and disturbed development footprint, and because there are no other alternative locations which could accommodate the road widening improvements, and the improvements are located and designed so as not to impact ESHA, with implementation of appropriate mitigation measures identified in the FEIR, the Modified Redesigned Alternative road improvements are consistent with applicable LCP policies relative to ESHA buffers (policies 3.23- 3.30). The Modified Redesign Alternative addresses all potential policy conflicts and, therefore, potential land use impacts associated with the Modified Redesign Alternative would be *potentially significant.* Mitigation Measure **MM LUP-2** is required to address this impact.

Escondido Canyon Park

The Proposed Plan analyzed in the DEIR includes park and recreation improvements at Escondido Park including trails, parking, camp areas and associated support facilities. Section 4.0, *Consistency with Plans and Policies,* indicates that the proposed park improvements and uses at Escondido Canyon Park are consistent with applicable plans and policies adopted for the purpose of avoiding or mitigating an environmental effect. As a result, impacts associated with potential development conflicts with plans and policies adopted for the purpose of avoiding or mitigating an environmental effect are considered *less than significant*.

The Modified Redesigned Alternative includes a reduced scope of improvements for Escondido Canyon Park which includes only trail improvements. Impacts associated with potential development conflicts with plans and policies adopted for the purpose of avoiding or mitigating an environmental effect would remain *less than significant*.

Latigo Trailhead

Parking and Camping Improvements-Geology Hazards

The policy consistency analysis contained in Section 4.0 *Consistency with Plans and Policies,* of the DEIR indicates that proposed Plan facility improvements at the Latigo Trailhead property present a potentially significant and unavoidable impact associated with geologic landslide hazard, inconsistent with Section 30253 of the Coastal Act and City of Malibu Local Coastal Program Policies 4.2, 4.14, 4.4, and Section 3.4.2.D.11.a. The DEIR identifies the southwest edge of the proposed Latigo Trailhead parking lot as being within the limits of a recent landslide; and that the proposed Plan emergency fire shelter and water storage tank are located essentially coincident with the northern limit of the same landslide; and the Proposed Plan's self-contained restroom and Camp Host space are within 30-40 feet of the current landslide boundary. The policy consistency analysis contained in Section 4.0 indicates the proposed park improvements within, or immediately adjacent to, the identified boundary of the historic landslide could be subject to damage or failure via further landslide activity. As a result, Proposed Plan improvements for the Latigo Trailhead property would potentially conflict with land use plan policies addressing potential geologic hazards and protection of environmentally sensitive habitat areas adopted for the purpose of avoiding or mitigating an environmental effect, resulting in a *significant and unavoidable impact.*

The Modified Redesigned Alternative includes a reduced parking area, day-use picnic areas and a restroom at the Latigo property. All structural improvements would be located with adequate setbacks from the recent landslide identified on the property. Picnic tables would be placed near the landslide area but with no grading. With implementation of appropriate mitigation measures identified in the FEIR, the park facility improvements at the Latigo Trailhead would be consistent with Section 30253 of the Coastal Act and City of Malibu Local Coastal Program Policies 4.2, 4.14, 4.4. As such, the Modified Redesign Alternative addresses and eliminates all potential policy conflicts identified in the Draft EIR for the Proposed Plan. Potential land use impacts associated with the Modified Redesign Alternative would therefore be reduced to *potentially significant.* Mitigation Measure **MM LUP-2** is required to address this impact.

Parking and Camping Emergency Fire Shelter Improvements-ESHA

The policy consistency analysis contained in Section 4.0 *Consistency with Plans and Policies,* of the DEIR indicates that implementation of the proposed Plan would result in minor impacts to sensitive habitats at the Latigo Trailhead property resulting from development that does not constitute a resource-dependent use, and which is therefore prohibited in environmentally sensitive habitat areas as defined by Section 30240 of the

Coastal Act and City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69. The proposed Plan analyzed in the DEIR includes direct development and fuel modification encroachments into a variety of native vegetation areas associated with parking improvements and optional emergency fire shelters. The policy consistency analysis included in Section 4.0, *Consistency with Plans and Policies* of the DEIR indicates these improvements would potentially conflict with policies addressing protection of environmentally sensitive habitat areas adopted for the purpose of avoiding or mitigating an environmental effect, resulting in a *significant and unavoidable impact*.

The Modified Redesigned Alternative includes a reduced parking area, day-use picnic areas, a single restroom and trail improvements for the Latigo property. The proposed parking and restroom improvements would be located in a disturbed area and outside of all mapped ESHA on the property, and therefore would not conflict with Section 30240 of the Coastal Act or City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69. In addition, because there are no other alternative locations which could accommodate the parking area, with implementation of appropriate mitigation measures identified in the FEIR, the proposed parking improvements are consistent with applicable LCP policies relative to ESHA buffers (policies 3.23- 3.30). The Modified Redesign Alternative addresses and eliminates all potential policy conflicts identified in the Draft EIR for the proposed Plan. Potential land use impacts associated with the Modified Redesign Alternative would therefore be reduced to *potentially significant.* Mitigation Measure **MM LUP-2** is required to address this impact.

Corral Canyon Park

Employee/Camp Host Quarters and Fire Truck Shed

The policy consistency analysis contained in Section 4.0 *Consistency with Plans and Policies,* of the DEIR for the proposed Plan indicates that implementation of the proposed project would result in minor impacts to sensitive habitats resulting from development at Corral Canyon Park that does not constitute a resource-dependent use, and which is therefore prohibited in environmentally sensitive habitat areas as defined by Section 30240 of the Coastal Act and City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69. These improvements and associated impacts include fuel modification requirements for the Corral Canyon Park camp host and fire truck shed improvement area. As a result, the proposed Plan improvements for Corral Canyon Park would potentially conflict with policies addressing protection of environmentally sensitive habitat areas adopted for the purpose of avoiding or mitigating an environmental effect, resulting in a *significant and unavoidable impact*.

The Modified Redesign Alternative includes redesigned park and recreation improvements and a detailed policy consistency analysis for the Modified Redesign Alternative-Public Works Plan, which is included in Appendix MRA-4 of the FEIR, and which incorporates additional analysis based on comments received on the DEIR and the redesigned scope of improvements. Similar to the proposed project, Modified Redesign Alternative Project impacts to native vegetation areas result from fuel modification requirements for employee/camp host quarters, and fire truck shed improvements. As identified in the policy consistency analysis for the Modified Redesign Alternative-Public Works Plan, fuel modification associated with employee/camp host quarters and fire truck shed improvements at Corral Canyon Park would be limited to areas already subject to fuel modification requirements associated with the adjacent restaurant and RV facility. City of Malibu Land Use Plan 3.1, ESHA Designation, specifically exempts areas subject to fuel modification activities as follows: "*Existing, legally established agricultural uses, confined animal facilities, and fuel modification areas required by the Los Angeles County Fire Department for existing, legal structures do not meet the definition of ESHA."* Although fuel modification associated with the employee/camp host quarters and fire truck shed will result in encroachment into native vegetation areas, these affected areas are already subject to current fuel modification activities and are therefore not considered ESHA under the Malibu LCP. As such, the Modified Redesign Alternative would not conflict with Section 30240 of the Coastal Act or City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69. In addition, as the proposed employee/camp host quarters and fire truck shed improvements consist of improvements to an existing and disturbed development footprint (an existing, paved parking area) and are located and designed so as not to impact ESHA, and because there are no other alternative locations which could accommodate the improvements, with implementation of appropriate mitigation measures identified in the FEIR, the employee/camp host quarters and fire truck shed improvements are consistent with applicable LCP policies relative to ESHA buffers (policies 3.23- 3.30). The Modified Redesign Alternative addresses and eliminates all potential policy conflicts identified in the Draft EIR for the proposed Plan. As such, potential land use impacts associated with the Modified Redesign Alternative would be reduced to *potentially significant.* Mitigation Measure **MM LUP-2** is required to address this impact.

Camping Emergency Fire Shelter Improvements

The policy consistency analysis contained in Section 4.0 *Consistency with Plans and Policies,* of the DEIR for the proposed Plan indicates that implementation of the proposed project would result in minor impacts to sensitive habitats resulting from development at Corral Canyon Park that does not constitute a resource-dependent use, and which is therefore prohibited in environmentally sensitive habitat areas as defined by Section

30240 of the Coastal Act and City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69. These improvements include fuel modification requirements for the Corral Canyon Park Emergency Fire Shelters. As a result, the proposed Plan improvements for Corral Canyon Park would potentially conflict with policies addressing protection of environmentally sensitive habitat areas adopted for the purpose of avoiding or mitigating an environmental effect, resulting in a *significant and unavoidable impact*.

The Modified Redesign Alternative includes redesigned park and recreation improvements and a detailed policy consistency analysis for the Modified Redesign Alternative-Public Works Plan, which is included in Appendix MRA-4 of the FEIR, and which incorporates additional analysis based on comments received on the DEIR and the redesigned scope of improvements. Similar to the proposed project, Modified Redesign Alternative Project impacts to native vegetation areas result from fuel modification requirements for the emergency fire shelters. The policy consistency analysis for the Modified Redesign Alternative-Public Works Plan analyzes proposed improvements with the City of Malibu Land Use Plan policy 5.69 and City of Malibu Local Implementation Plan policy 3.5.2.D.7.a., which define resource-dependent uses for the proposed park improvements as follows:

City of Malibu Land Use Plan policy 5.69

> *Overnight campsites, including "low-impact" campsites, are permitted uses in parklands subject to the Malibu Parks Public Access Enhancement Plan Overlay and should be developed within park boundaries for public use to provide a wider range of recreational opportunities and low-cost visitor serving opportunities for visitors of diverse abilities, where impacts to coastal resources are minimized and where such sites can be designed within site constraints and to adequately address public safety issues. For purposes of this Overlay, low impact campsites (and associated support facilities including, where appropriate, picnic tables, potable water, self-contained chemical/composting restrooms, shade trees, water tanks, portable fire suppression apparatus, and fire-proof cooking stations) are "carry-in carry-out" campsites accessed by foot or wheelchair and which have an educational or interpretative component including signage related to the natural resources of the Santa Monica Mountains. Low impact campsites, as defined, constitute a resource dependent use.*

City of Malibu Local Implementation Plan policy 3.5.2.D.7.a.

> *Trails, camp facilities, park uses as described in this Overlay, and necessary support facilities shall be considered permitted uses for those parkland areas subject to the Malibu Parks Public Access Enhancement Plan Overlay and as identified on the Public Parkland Map and Proposed Trail Resources Map. Trails and other resource dependent park uses, and necessary support facilities associated with resource dependent uses, located within or*

adjacent to areas mapped as ESHA shall be sited and designed to avoid significant disruptions of habitat values within the ESHA and avoid significantly degrading such areas. Minor disruptions to ESHA resulting from resource dependent uses shall be mitigated pursuant to LIP provision 3.4.2(D)(7)(a)(viii).

Policy 5.69 specifically defines low-impact campsites and associated support facilities as resource dependent uses. Policy 3.5.2.D.7.a. further specifies that resource dependent park uses and necessary support facilities associated with resource dependent park uses, located within or adjacent to areas mapped as ESHAs, must be sited and designed to avoid significant disruption of habitat values and that appropriate mitigation be applied pursuant to the certified LCP. These policies recognize trails and low-impact campsites, and associated support facilities, as resource dependent uses and as such acknowledge that such uses may occur within ESHA.

In addition, City of Malibu Local Implementation Plan policy 3.5.2.D.12 defines support facilities under the Malibu Parks Public Access Enhancement Plan Overlay as follows:

Existing and proposed support facilities are defined as those facilities deemed necessary to support the primary permitted land use, public access and recreation, research and education, and nature observation. The type of support facilities addressed at each park facility shall be based on the level and complexity of public uses and specialized programs offered at each park area.

In approving the Overlay, the Coastal Commission concluded that low impact camping is a resource dependent use. The Commission's revised findings (LCPA 1-08, Revised Findings, included in Appendix A of the Malibu Parks Public Access Enhancement Plan Public Works Plan) explained:

"Clearly, hiking trails and low impact interpretive walk-in camp sites are dependent on the spectacular parkland sensitive habitats and resources. An integral part of any public access or recreational experience in the Santa Monica Mountains is the ability to experience the sights, smells, and feel of the habitat up-close by being within it; by being "in nature". This means that by its very essence, such access and recreation use, including its various components, is dependent on the resource to function at all."

"In order to clarify that campsites (including necessary support facilities) are a resource dependent use, the Commission finds it necessary to revise Section D2 of the Overlay to include a definition for "low impact campsites" and the limited support facilities associates with these campsites ETC." (LCPA 1-08, Revised Findings, p. 95.)

In connection with the Overlay and proposed trail and camp improvements, the County of Los Angeles Fire Department has stated its opposition to all the proposed parkland improvements unless certain mitigation measures are provided, including "approved fire proof shelters strategically located the trails and in camping areas to accommodate park visitors when evacuation is obstructed by an approaching fire" and "Emergency fire shelters shall be located as approved by the Fire Department" (6/2/09 Letter from Chief P. Michael Freeman to John Ainsworth, Dep. Dir., CCC; 6/2/09 Letter from Chief P. Michael Freeman to John Ainsworth, Dep. Dir., CCC; 04/21/10 Letter from County of Los Angeles Fire Department to Judi Tamasi, Santa Monica Mountains Conservancy). Thus, at this time and from the perspective of the Fire Department, but for fire protection shelters and any associated fuel modification required by the Fire Department, there can be no new trails, camp areas or any other increased public use of the parklands in the Plan area. If required, fire protection shelters and associated fuel modification would therefore be equally integral to the public access and recreation experience in the Santa Monica Mountains because, according to the Fire Department, they would be essential to the ability to develop trails and low impact campsites and therefore are necessary support facilities associated with resource dependent uses as defined by to Policies 5.69 3.5.2.D.7.a. As such, fire protection shelters and associated fuel modification would be resource-dependent uses and may occur in ESHA where sited and designed to avoid significant disruption of habitat values and with appropriate mitigation applied pursuant to the certified LCP. As such, the Modified Redesign Alternative is consistent with Section 30240 of the Coastal Act or City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69.

The Modified Redesign Alternative addresses and eliminates all potential policy conflicts identified in the Draft EIR for the proposed Plan. As such, potential land use impacts associated with the Modified Redesign Alternative would be reduced to potentially significant. Mitigation Measure **MM LUP-2** is required to address this impact.

Malibu Bluffs

The policy consistency analysis contained in Section 4.0 *Consistency with Plans and Policies,* of the DEIR indicates that implementation of the proposed Plan would result in minor impacts to sensitive habitats resulting from development at Malibu Bluffs that does not constitute a resource-dependent use, and which is therefore prohibited in environmentally sensitive habitat areas as defined by Section 30240 of the Coastal Act and City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69. These improvements and associated impacts are limited to encroachment of circulation improvements and fuel modification requirements for a parking/camp host/emergency fire shelter improvement area (Parking Area 3). As a result, the proposed Plan

improvements for Malibu Bluffs would potentially conflict with policies addressing protection of environmentally sensitive habitat areas adopted for the purpose of avoiding or mitigating an environmental effect, resulting in a *significant and unavoidable impact.*

The Modified Redesigned Alternative includes a redesigned scope of improvements for Malibu Bluffs which eliminates all impacts to ESHA from non-resource dependent uses. The park entrance road for Parking Area 3 would result in very minor encroachment into an isolated patch of laurel sumac / California sagebrush vegetation located adjacent to Pacific Coast Highway. The policy consistency analysis for the Modified Redesign Alternative-Public Works Plan analyzes site-specific biological data in this location for consistency with ESHA designation policies of the LCP and, based on site-specific evidence, determines that the area does not meet the definition of an ESHA. This is a 0.56 acre which supports laurel sumac scrub and California sage brush vegetation, which is situated as a linear, isolated area located directly adjacent to Pacific Coast Highway. The northerly portion of the area is located in the Pacific Coast Highway right-of-way and, unlike the majority of the Malibu Bluffs property, there is no natural berm that provides a topographic separation of this area from activities occurring along the highway corridor. Due to its isolated nature and linear location directly adjacent to the highway in an area that is subject to ongoing disturbance, the area is not considered part of the larger laurel sumac scrub and California sage brush community the occurs on Malibu Bluffs. No special-status plant or wildlife species were recorded in this area during biological resource surveys conducted in 2009 and 2010. Further, given its isolated nature and the fact that its consistently subject to a high level of disturbance, the area likely does not provide habitat for special-status plant and wildlife species nor provide essential wildlife movement corridors or critical ecological linkages in the area. Therefore, this 0.56-acre patch of laurel sumac scrub and California sage does not meet the City's definition of ESHA as it does not support plants or wildlife that are particularly rare or valuable and which could be easily disturbed or degraded by human activities and development. As such, the Modified Redesign Alternative would not conflict with Section 30240 of the Coastal Act or City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69. In addition, as there are no other alternative locations which could accommodate the entrance road, and the improvements are located and designed so as not to impact ESHA, with implementation of appropriate mitigation measures identified in the FEIR, the entry road improvements for Parking Area 3 are consistent with applicable LCP policies relative to ESHA buffers (policies 3.23- 3.30).

The Modified Redesign Alternative addresses and eliminates all potential policy conflicts identified in the Draft EIR for the Proposed Plan. As such, potential land use impacts

associated with the Modified Redesign Alternative would be reduced to *potentially significant.* Mitigation Measure **MM LUP-2** is required to address this impact.

Mitigation Measures

The Draft EIR includes discussion of potential land use impacts associated with physical division of an established community and conflicts with applicable habitat conservation or natural community conservation plans remains applicable to the Modified Redesign Alternative. As these impacts would be less than significant, no mitigation measures are required.

The Draft EIR's discussion of mitigation measures for potential land use impacts associated with potential policy conflicts remains applicable to the Modified Redesign Alternative, except that, as described in this section, the Modified Redesign Alternative addresses and eliminates all potential policy conflicts identified in the Draft EIR for the proposed Plan. As such, potential land use impacts associated with the Modified Redesign Alternative would be reduced to *potentially significant, but mitigable (Class II).*

Mitigation measures required for the Proposed Plan would also be required under the Modified Redesign Alternative. No additional mitigation measures would be required.

LUP-2: The proposed Plan shall comply with mitigation measures identified in Section 3.7, *Geology, Soils and Seismic Hazards*, of the Modified Redesign Alternative Technical Memorandum to address potential conflicts with Section 30253 of the Coastal Act, and City of Malibu Local Coastal Program Policies 4.2, 4.14, 4.4, and Section 3.4.2.D.11.a., and shall comply with mitigation measures identified in Section 3.4, *Biological Resources,* of the Modified Redesign Alternative Technical Memorandum to address potential conflicts with Section 30240 of the Coastal Act and City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69.

The Modified Redesign Alternative includes park and recreation improvements that would be redesigned and generally reduced throughout the Plan area, and a detailed policy consistency analysis has been prepared for the Modified Redesign Alternative which incorporates additional analysis based on comments received on the Draft EIR and the redesigned/reduced scope of improvements. With these project elements, the Modified Redesign Alternative includes feasible mitigation measures included in Section 3.7, *Geology, Soils and Seismic Hazards* of this Chapter, that would be sufficient to fully mitigate geologic hazards associated with proposed improvements at the Latigo Trailhead Property and thereby address potential conflicts with Section 30253 of the Coastal Act, and City of Malibu Local Coastal Program Policies 4.2, 4.14, 4.4, and

Section 3.4.2.D.11.a. Similarly, feasible mitigation measures identified in Section 3.4, *Biological Resources* of this Chapter, would be sufficient to resolve potential policy conflicts associated with implementing non-resource dependent development with impacts to sensitive habitat areas, which are prohibited in environmentally sensitive habitat areas as defined by Section 30240 of the Coastal Act and City of Malibu Local Coastal Program Policies 3.8, 3.9, and 5.69. As a result, land use impacts related to potential conflicts with policies addressing geologic hazards and protection of environmentally sensitive habitat areas, adopted for the purpose of avoiding or mitigating an environmental effect would be reduced to *potentially significant, but mitigable (Class II)*.

Residual Impacts

The analysis of residual impacts for the Proposed Plan (as identified in the Draft EIR) relative to potential impacts associated with physical division of an established community and conflicts with applicable habitat conservation or natural community conservation plans remains applicable to the Modified Redesign Alternative. These residual impacts would **be *less than significant (Class III).***

Under the Proposed Plan, land use impacts associated with potential policy conflicts were identified as *significant and unavoidable (Class I)*. The Modified Redesign Alternative includes park and recreation improvements that would be redesigned and generally reduced throughout the Plan area, and a detailed policy consistency analysis has been prepared for the Modified Redesign Alternative which incorporates additional analysis based on comments received on the Draft EIR and the redesigned/reduced scope of improvements. The Modified Redesign Alternative addresses and eliminates all potential policy conflicts identified in the Draft EIR for the Proposed Plan. As such, potential land use impacts associated with the Modified Redesign Alternative would be reduced to ***potentially significant, but mitigable (Class II).***

Analysis of Impacts Post-Mitigation

The analysis of impacts post-mitigation for the Proposed Plan (as identified in the Draft EIR) would remain applicable to the Modified Redesign Alternative. Implementation of the proposed mitigations for the Modified Redesign Alternative would be *less than significant (Class III)*.

3.11.3 Cumulative Impacts

The analysis of cumulative land use impacts for the Proposed Plan (as identified in the Draft EIR) remains applicable to the Modified Redesign Alternative. Cumulative impacts on land use and planning would be *less than significant (Class III)*.

3.11.4 Comparative Analysis

Under the Proposed Plan, all potential land use impacts associated with physical division of an established community and conflicts with applicable habitat conservation or natural community conservation plans remains applicable to the Modified Redesign Alternative. The Modified Redesign Alternative would further reduce these potential impacts; as such, impacts would remain *less than significant (Class III)*.

Under the Proposed Plan, land use impacts associated with potential policy conflicts were identified as *significant and unavoidable (Class I)*. The Modified Redesign Alternative includes park and recreation improvements that would be redesigned and generally reduced throughout the Plan area, and a detailed policy consistency analysis has been prepared for the Modified Redesign Alternative which incorporates additional analysis based on comments received on the DEIR and the redesigned/reduced scope of improvements. The Modified Redesign Alternative addresses and eliminates all potential policy conflicts identified in the Proposed Plan DEIR. As such, potential land use impacts associated with the Modified Redesign Alternative would be reduced to *potentially significant, but mitigable (Class II)*. ***Therefore, land use impacts would be reduced in comparison to the Proposed Plan.***

3.12 Noise

3.12.1 Setting

The setting for this alternative section would not differ from that identified within Section 5.12, *Noise*, of the Draft EIR.

3.12.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would be similar to that which was identified within Section 5.12, *Noise*, of the Draft EIR.

Project Impacts

Proposed improvements under the Modified Redesign Alternative would be substantially similar to the proposed project, with some notable reductions in parking spaces and campsites within certain park properties, and nominal increases in the number of camp sites at Corral Canyon Park and the Malibu Bluffs Conservancy Property. The sections below detail the shift in impacts per park, for the Modified Redesign Alternative as compared to the Proposed Project.

Ramirez Canyon Park

Short-term Construction Noise

Proposed improvements within Ramirez Canyon Park under the Modified Redesign Alternative would be substantially reduced as compared to the Proposed Project. Principally, camping would be reduced from 5 to 2 campsites for Ramirez Canyon Park and three proposed parking lots along the shoulder of Kanan Dume Road would be reduced in size. The extent of new construction would be less for Ramirez Canyon Park under the Modified Redesign Alternative. As such, the duration and frequency of construction activity to implement this Alternative would be less than the Proposed Plan. However, the segments of Ramirez Canyon Road and Delaplane Road proposed to be widened are within 100 feet of existing residences. Rural residential developments are also located as close as 50 feet from the southern site boundary of Ramirez Canyon Park, with exterior living areas abutting the property line. As such, construction activities associated with the Ramirez Canyon Park improvements have the potential to generate exterior noise levels at sensitive receptor locations that could adversely affect adjacent noise-sensitive uses and would be considered to create a *potentially significant* impact. Mitigation measures **MM N-1.1** through **MM N-1.10** which

address construction noise control would be required. Because of the smaller size of the Kanan Dume Road parking area, and reduction in total number of campsites, short-term construction noise under the MRA would be slightly less than under the Proposed Plan.

Noise Exposure for Campers

Two accessible campsites are proposed (at the location of the existing tennis courts) within Ramirez Canyon Park under the Modified Redesign Alternative. Impacts to campers from transportation-related noise sources and adjacent residential and recreational related activity would be equivalent to that which was identified for the Proposed Plan at this location; impacts, therefore, would be considered *less than significant* with this Alternative. With the reduction in number of overall campsites under the MRA, camper noise exposure would be slightly less than under the Proposed Plan.

Camping Activity Noise Exposure for Adjacent Residences

Two accessible campsites are proposed (at the location of the existing tennis courts) within Ramirez Canyon Park under the Modified Redesign Alternative. Impacts to adjacent residential areas from campers would be equivalent to that which was identified for the Proposed Plan at this location. Impacts, therefore, would be considered *less than significant* with this Alternative. With the reduction in number of overall campsites under the MRA, camping activity noise exposure would be slightly less than under the Proposed Plan.

Escondido Canyon Park

Short-term Construction Noise

Proposed Escondido Canyon Park improvements under the Modified Redesign Alternative would be greatly reduced as compared to the Proposed Plan. Chiefly, no camping would be included for Escondido Canyon Park; there would not be a camp host site or a parking lot complex (including restroom and water tank). Improvements at this Park would be limited to trail work located far to the north from existing residential uses located along Winding Way. As such, construction activities associated with the Escondido Canyon Park trail improvements under the Modified Redesign Alternative would not have a great potential to generate exterior noise levels at sensitive receptor locations that could adversely affect adjacent noise-sensitive uses; but to be conservative these impacts have been classified as *potentially significant*. Mitigation measures **MM N-1.1** through **MM N-1.10**, which address construction noise control, would be required.

Noise Exposure for Campers

All proposed camp sites within Escondido Canyon Park would be eliminated under the Modified Redesign Alternative. Therefore, this *less than significant* impact identified for Escondido Canyon Park under the Proposed Plan would be avoided entirely with this Alternative.

Camping Activity Noise Exposure for Adjacent Residences

All proposed camp sites within Escondido Canyon Park would be eliminated under the Modified Redesign Alternative. Therefore, no potential exists for even adverse nuisance noise impacts from camping activities upon noise-sensitive land uses in the vicinity of this park property. This Alternative would therefore have lower noise impacts than the Proposed Plan.

Latigo Canyon Trailhead

Short-term Construction Noise

Proposed improvements under the Modified Redesign Alternative would be substantially reduced as compared to the Proposed Plan. To wit, no camping would be included for Latigo Canyon Trailhead; there would not be a camp host site; no emergency fire shelter would be provided; no water storage tank is proposed; and, restrooms would be reduced to one. Picnic tables would be placed in currently cleared o paved areas of the site. Structural development within Latigo Canyon Trailhead under this alternative would be limited to a small parking lot and a separate restroom. The proposed parking lot and restroom would be located approximately 300 feet from an existing residence to the west. Construction activities would be less extensive under this Alternative. However, these construction activities for the Latigo Canyon Trailhead improvements even under the Modified Redesign Alternative have the potential to generate exterior noise levels at sensitive receptor locations that could adversely affect adjacent noise-sensitive uses, and would be considered to create a potentially significant impact. Mitigation measures **MM N-1.1** through **MM N-1.10**, which address construction noise control, are required. However, overall, the short-term construction noise impacts under the MRA would be less than under the Proposed Plan.

Noise Exposure for Campers

All proposed camp sites within Latigo Canyon Trailhead would be eliminated under the Modified Redesign Alternative. Therefore, this *less than significant* impact identified for

Latigo Canyon Trailhead under the Proposed Plan would be avoided entirely with this Alternative.

Camping Activity Noise Exposure for Adjacent Residences

All proposed camp sites within Latigo Canyon Trailhead would be eliminated under the Modified Redesign Alternative. Therefore, no potential exists for even adverse nuisance noise impacts from camping activities upon noise-sensitive land uses in the vicinity of this park property. This Alternative would therefore have lower noise impacts than the Proposed Plan.

Corral Canyon

Short-term Construction Noise

Proposed improvements under the Modified Redesign Alternative are very similar to the Proposed Plan: the proposed camp host parking spot in the existing parking lot would be replaced by employee quarters; one adjacent restroom would be augmented with a second restroom; the north Corral Canyon camping area (5 sites) would be replaced by a day use picnic area; the south Corral Canyon camping area would be augmented with 6 camping sites and an additional restroom. The proposed accessible trail drop-off area and camp sites would be located approximately 900 feet from an established residential community along Bayshore Drive and Malibu Road (these residences are located on the opposite side of Highway 1 from the proposed park improvements). As such, construction activities associated with development of Corral Canyon Park improvements have the potential to generate exterior noise levels at sensitive receptor locations that could adversely affect adjacent noise-sensitive uses and would be considered to create a *potentially significant* impact. Mitigation measures **MM N-1.1** through **MM N-1.10** which address construction noise control would be required.

Noise Exposure for Campers

The upper canyon camp sites of the Proposed Plan would be relocated /clustered with the lower canyon camp sites under the Modified Redesign Alternative. The future (year 2025) 65 dBA CNEL noise contour associated with Pacific Coast Highway adjacent to Corral Canyon Park is calculated to be approximately 200 feet from the center line of the road, for areas with direct traffic noise exposure to Pacific Coast Highway. Based on the results of the traffic noise modeling, all the campsites and the employee quarters would be exposed to noise levels of less than 65 dBA CNEL. Therefore, the proposed Corral Canyon Park camp sites and employee quarters would be exposed to noise levels of less than 65 dBA CNEL, and the impact would be considered *less than*

significant. No mitigation measures would be required for this identified insignificant noise impact. This impact level would be essentially equivalent under the MRA or Proposed Plan.

Camping Activity Noise Exposure for Adjacent Residences

The proposed camp sites would be located 900 feet or more from a neighboring residential neighborhood (across Highway 1); at this distance, typical noise associated with camp site activities would not be noticeable or constitute a nuisance. Therefore, camping activity noise impacts from Coral Canyon Park under the Modified Redesign Alternative are considered *less than significant*. No mitigation is required for this insignificant noise impact. This impact level would be essentially equivalent under the MRA or Proposed Plan.

Malibu Bluffs

Short-term Construction Noise

Proposed improvements for Malibu Bluffs under the Modified Redesign Alternative would be similar to the Proposed Plan. In short, the changes for this Alternative from the Proposed Plan can be described as: the two proposed camp host parking spots in Parking Area 1 would be replaced with permanent employee quarters and a camp host site; one restroom would be augmented adjacent to the employee quarters; an additional 3 camping sites would be included in Camping Area 1; Parking Lot 2 would be eliminated; 5 additional camping sites would be included in Camping Area 2; and Camping Area 3 and 4 would be clustered together into an overall smaller footprint, with 5 less spaces than the Proposed Plan. Proposed Parking Lot 1and immediately adjacent camp sites, would be located approximately 80-100 feet from an existing residence to the west, and 300-400 feet from of an existing residential neighborhood to the north (across PCH); within the East Bluff area, proposed camp sites would be located between 250 feet to 700 feet from residences to the south (across Malibu Road). As such, construction activities associated with development of Malibu Bluffs improvements have the potential to generate exterior noise levels at sensitive receptor locations that could adversely affect adjacent noise-sensitive uses and would be considered to create a *potentially significant* impact. Mitigation measures **MM N-1.1** through **MM N-1.10**, which address construction noise control, would be required. Short-tern construction-related noise impacts would be highly similar under the MRA or Proposed Plan.

Noise Exposure for Campers

Under the Modified Redesign Alternative, in Camping and Parking Area 1 there is a grouping of camp sites and two employee quarters located between 100 and 200 feet from Pacific Coast Highway. In camping area 2, there is a grouping of camp sites located between 200 and 400 feet from Pacific Coast Highway. Along the western third of the Malibu Bluffs, there is a ridge paralleling the south side of the Pacific Coast Highway right-of-way, which varies in height from 6 to 12 feet above the pavement surface of the highway. Also, along the eastern third of the Malibu Bluffs, there is a ridge paralleling the south side of the Pacific Coast Highway right-of-way, which varies in height from 5 to 15 feet above the pavement surface of the highway. These ridges would provide attenuation of the noise levels from Pacific Coast Highway for areas behind them (to the south). The employee quarters and three camp sites in Camp Area 1 closest to PCH, and the camping areas in Camp Area 2 closest to PCH (6 total), would be located just outside the 65 dBA CNEL noise contour; the associated noise impact would be considered *less than significant*. Mitigations are not required for this insignificant noise impact. Because the location does not change for campsites located closest to PCH, under the MRA or Proposed Plan, noise exposure impacts for campers would be equivalent between the two.

Camping Activity Noise Exposure for Adjacent Residences

For camp sites, noise generating activities would generally include a variety of activities such as driving of tent stakes, conversation, cooking functions, children playing, music, cars in the parking lots, people walking along trails, periodic maintenance of toilets and trails, etc. These types of activities would typically generate low to moderate levels of noise. However, because of the close proximity of the most westerly proposed camp sites (Camp Area 1) to the western Park property boundary and adjacent existing residential property (approximately 80 feet to the residential property line) the potential exists that noise from camping activities could cause nuisance noise which exceeds the City of Malibu's maximum noise level thresholds for the adjacent residential development. Consequently, noise from activities at these proposed camp sites would result in a *potentially significant nuisance noise impact*. This impact would be essentially equivalent to the impact identified for the Proposed Plan. Mitigation measures **MM N-3.1** through **MM N-3.6** which address noise control for camping activities are required for Malibu Bluffs under the Modified Redesign Alternative and would mitigate impacts.

Mitigation Measures

Mitigation measures required for the Proposed Plan would also be required under the Modified Redesign Alternative. No additional mitigation measures would be required.

MM N-1.1 **Diesel Equipment.** Construction contractors shall operate all diesel equipment with closed engine doors, the equipment shall be equipped with factory-recommended mufflers, and engine idling shall be kept to a minimum.

MM N-1.2 **Electrical Power.** Whenever feasible, construction contractors shall use electrical power to run air compressors and similar power tools. Any construction or caretaker trailers shall be connected to existing electrical utility lines on or adjacent to the Plan site.

MM N-1.3 **Sound Blankets.** Where construction employing heavy equipment would occur within 400 feet of a neighboring residential property line, construction contractors shall use sound blankets on noise-generating equipment or erect a temporary sound barrier between the construction zone and neighboring residential property.

MM N-1.4 Stationary construction equipment that generates noise that exceeds 65 dBA at the boundaries of any of the Plan's parks shall be shielded with the most modern and effective noise control devices (i.e., mufflers, lagging, and/or motor enclosures to City's satisfaction), and these devises shall be located at a minimum of 200 feet from noise sensitive receptors.

MM N-1.5 Tools used for project construction shall be hydraulically or electrically powered to avoid noise associated with compressed-air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed-air exhaust shall be used. In general, quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible.

MM N-1.6 All equipment shall be properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, is generated.

MM N-1.7 The construction superintendent contact information, including cell phone number, and contact information for Conservancy/MRCA personnel, shall be posted on signs surrounding the improvement areas throughout construction.

The signs shall also include the approved daily hours of operation, such that any public complaints can be reported efficiently.

MM N-1.8 Stockpiling, dirt hauling routes, and vehicle staging areas shall be located as far as practical from sensitive noise receptors, including residents. Every effort shall be made to create the greatest distance between noise sources and sensitive receptors during construction activities.

MM N-1.9 Staging areas shall be provided on-site to minimize off-site transportation of heavy construction equipment. The staging areas shall be located to maximize the distance to residential areas.

MM N-1.10 Noise-generating construction activity shall be limited to the hours of 7:00 AM and 7:00 PM on Monday through Friday, and 8:00 AM and 5:00 PM on Saturday.

Plan Requirements and Timing: This requirement shall be identified as a note on the grading, construction, and restoration plans for each phase.

Monitoring: MRCA or a designated monitor, shall conduct periodic site inspections during the construction period to ensure compliance and respond to complaints.

MM N-3.1 Electronic sound emitting devices such as radios, TVs, etc., used at campsites and on trails shall be operated so that sound is not audible at adjacent campsites and off-site properties.

MM N-3.2 Quiet hours shall be from 10 p.m. to 6 a.m.

MM N-3.3 No generators shall be allowed in camping areas.

MM N-3.4 MRCA Park Rangers/ Hosts shall have a zero tolerance policy on public intoxication, and any other unlawful or disrupting behavior.

MM N-3.5 The Camp Host and/or Park Ranger shall enforce all applicable ordinances and regulations designed to restrict the generation of nuisance/ objectionable noise.

MM N-3.6 MRCA shall post a contact telephone number and email addresses at each park or MRCA trail facility entrance for neighbors to lodge noise complaints or other concerns. Complaints shall be addressed in a diligent and responsive manner.

Plan Requirements and Timing: Prior to construction of Plan facilities, MRCA shall ensure that the mitigations for posting of notices be included within project construction documents. MRCA shall implement the above operational noise mitigations/ restrictions throughout the duration of the Plan.

Monitoring: MRCA rangers and/or hosts shall enforce the above noise restrictions at all Plan campsite areas. MRCA shall respond to neighbor complaints in a timely manner. MRCA shall submit to its Board (and for public review and consumption) annual reports at the beginning of each calendar year documenting compliance with this condition for the prior year. The reports shall include a log of complaints received by neighbors and what measures are being taken to respond to the complaints.

Residual Impacts

With implementation of the above mitigation measures, impacts related to noise would be considered ***less than significant (Class II)***.

Analysis of Impacts Post-Mitigation

The general discussion of noise impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.12.3 Cumulative Impacts

The general discussion of cumulative noise impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.12.4 Comparative Analysis

The overall noise impact level of the Modified Redesign Project Alternative would be considered *potentially significant, but mitigable (Class II)* (similar to the Proposed Plan), although to a somewhat lesser degree due to an expected decrease in visitation in the

Plan area. ***Therefore, noise impacts would be slightly decreased in comparison to the Proposed Plan.***

3.13 Public Services

3.13.1 Setting

The setting for this alternative section would not differ from that identified with Section 5.13, *Public Services*, contained within the Draft EIR.

3.13.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section be similar to that identified with Section 5.13, *Public Services*, contained within the Draft EIR.

Project Impacts

Proposed improvements under the Modified Redesign Alternative would be similar to the Proposed Plan, with some notable reductions in campsites within certain park properties. The total number of campsites would be reduced from 71 to 54 campsites. The reduction in campsites and support facilities under this alternative would likely reduce the number of anticipated visitors to the Plan area and a corresponding reduction in demand for public services. In addition, the introduction of Park Administration/Employee Quarters at Corral Canyon Park and Malibu Bluffs would provide opportunities for increased patrols and presence at these park areas, further minimizing the demand for outside agency public services. Similar to the Proposed Plan, the Modified Redesign Alternative would not result in an increase in demand for fire or police protection services; however, with a reduction in camp sites and parking spaces, park visitation under the Modified Redesign Alternative would likely be reduced, resulting in a corresponding decrease in the number of service calls. To ensure impacts associated with implementation of the Modified Redesign Alternative would not result in an increased demand for fire and police protection services, DEIR mitigation measure **MM PS-1** would be required. Impacts would be considered *potentially significant.*

Mitigation Measures

Similar to the Proposed Plan, although long term operational impacts associated with implementation of the Modified Redesign Alternative would not be anticipated to result in an increased demand for fire protection services, a mitigation measure is required in order to avoid the need for additional staff to monitor construction activity during Red Flag Days. Therefore, the following mitigation is required:

MM PS-1 In order to reduce potential impacts on fire protection services, all Plan construction activity shall cease during Red Flag Days. Efforts to control dust or otherwise secure the site(s) shall be permissible in consultation with MRCA staff. A brief training tutorial on fire avoidance and suppression efforts shall be provided to all construction staff prior to any field activity. Adequate fire fighting equipment shall be available on-site through construction to assist in the suppression of any accidental construction flare-ups.

Plan Requirements and Timing: This requirement shall be identified as a note on the grading, construction, and restoration plans for each phase.

Monitoring: MRCA shall confirm that fire training has occurred and that fire fighting equipment is available on-site prior to the commencement of construction activity. MRCA staff shall inspect construction sites during construction to verify compliance with this requirement.

No additional mitigation measures would be required.

Residual Impacts

With implementation of **MM PS-1**, impacts on public services would be considered ***less than significant (Class II)***.

Analysis of Impacts Post-Mitigation

The general discussion of public services impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.13.3 Cumulative Impacts

The general discussion of cumulative public services impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.13.4 Comparative Analysis

The overall impact level of the Modified Redesign Project Alternative on public services would be considered *potentially significant, but mitigable* (*Class II)* (similar to the Proposed Plan), although to a somewhat lesser degree due to the associated decrease in visitation in the Plan area. ***Therefore, impacts on public services would be slightly reduced in comparison to the Proposed Plan.***

3.14 Recreation

3.14.1 Setting

The setting for this alternative section would not differ from that identified with Section 5.14, *Recreation*, contained within pages 5.14-1 through 5.14-11 of the Draft EIR.

3.14.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would not differ from that identified with Section 5.14, *Recreation*, contained on page 5.14-11 of the Draft EIR.

Project Impacts

Proposed improvements under the Modified Redesign Alternative would be similar to the Proposed Plan, with some notable reductions in campsites within certain park properties. The total number of campsites would be reduced from 71 to 54 campsites. The reduction in campsites and support facilities under this alternative would eliminate much needed park and recreational facilities/opportunities in the area. However, a reduced amount of new recreational opportunities in this area would still create a beneficial impact on recreational resources. The overall impact level of the Modified Redesign Project Alternative on recreation would be considered less than significant (similar to the Proposed Plan).

Mitigation Measures

Similar to the Proposed Plan, no mitigation measures would be required.

Residual Impacts

Impacts would remain ***less than significant (Class III)***.

Analysis of Impacts Post-Mitigation

The general discussion of recreation impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.14.3 Cumulative Impacts

The general discussion of cumulative recreation impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.14.4 Comparative Analysis

The overall impact level of the Modified Redesign Project Alternative on recreation would be considered *Class III* (similar to the Proposed Plan). Although there would be a decrease in proposed park and recreation facilities available for use in the Plan area, the new recreational uses would still create a beneficial impact on recreational resources. ***On balance, impacts on recreation would be similar to the Proposed Plan.***

3.15 Transportation and Parking

3.15.1 Setting

The setting for this alternative section would be similar to that which was identified with Section 5.15, *Transportation and Parking*, of the Draft EIR.

3.15.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would not differ from that identified with Section 5.15, *Transportation & Parking*, contained within the Draft EIR.

Project Impacts

The Modified Redesign Alternative would provide a total of 54 campsites and 157 parking spaces (73 new spaces) at the five park sites, which is 17 fewer campsites and 45 fewer parking spaces when compared to the Proposed Plan. Table 3.15-1 and Table 3.15-2 present estimated weekday and weekend trips resulting from operation of the Plan site under the Modified Redesign Alternative. Trips were estimated based on the same generation rate used for campsites and day-use areas (parking spaces) during weekdays and weekends, as with the Proposed Project under the Ramirez Canyon Park Vacant Residential Baseline scenario. For reference, the tables also compare the trip generation estimates for this Alternative to the Proposed Project.

Table 3.15-1
Weekday Plan Trip Generation - Modified Redesign Alternative

Land Use	Size	ADT		A.M. Peak Hour		P.M. Peak Hour	
		Rate	Trips	Rate	Trips	Rate	Trips
Ramirez Canyon Park – Kanan Dume Road							
Day-Use Area	14 spaces [a]	3.6	50	0.14	2	0.29	4
Ramirez Canyon Park							
Baseline Traffic	N/A	N/A	0	N/A	0	N/A	0
Future Traffic [b]	N/A	N/A	80	N/A	8	N/A	8
Net Traffic Increase	N/A	N/A	0	N/A	0	N/A	0
	Subtotal		***130***		***10***		***12***
Escondido Canyon Park							
Campsites	0 campsites	2.0	0	0.15	0	0.15	0
Day-Use Area[c]	0 spaces	3.6	0	0.14	0	0.29	0

Table 3.15-1
Weekday Plan Trip Generation - Modified Redesign Alternative

Land Use	Size	ADT		A.M. Peak Hour		P.M. Peak Hour	
		Rate	Trips	Rate	Trips	Rate	Trips
	Subtotal		***0***		***0***		***0***
Latigo Trailhead							
Campsites	0 campsites	2.0	0	0.15	0	0.15	0
Day-Use Area [c]	4 spaces	3.6	14	0.14	1	0.29	1
	Subtotal		***14***		***1***		***1***
Corral Canyon Park							
Campsites	17 campsites	2.0	34	0.15	3	0.15	3
Day-Use Area [c]	2 spaces	3.6	7	0.14	0	0.29	1
	Subtotal		***41***		***3***		***4***
Conservancy's Malibu Bluffs Property							
Campsites	35 campsites	2.0	70	0.15	5	0.15	5
Day-Use Area [c]	5 spaces [d]	3.6	18	0.14	1	0.29	1
	Subtotal		***88***		***6***		***6***
	TOTAL		**273**		**20**		**23**
	Proposed Project		**421**		**27**		**35**
	Net Change		**-148**		**-7**		**-12**

Source: ATE, 2010
[a] Currently there are 12 parking spaces in the dirt lots on Kanan Dume Road. The project proposes to develop 14 parking spaces at Kanan for a net increase of 2 spaces. The analysis assumes no credit for the existing spaces as a worst-case scenario.
[b] Future traffic for Ramirez Canyon Park based on total allowable trips (40 inbound and 40 outbound trips for a total of 80 ADT).
[c] Park Use trips include trips associated with park visitors, campground hosts and park employees, busses, refuse pick-up, etc.
[d] Four spaces in overflow area used by camp hosts and employees. Assumes worst case day use rate.

Table 3.15-2
Weekend Plan Trip Generation - Modified Redesign Alternative

Land Use	Size	ADT		Peak Hour	
		Rate	Trips	Rate	Trips
Ramirez Canyon Park – Kanan Dume Road					
Day-Use Area	14 spaces [a]	5.3	74	0.29	4
Ramirez Canyon Park					
Baseline Traffic	N/A	N/A	0	N/A	0
Future Traffic [b]	N/A	N/A	80	N/A	8
Net Traffic Increase	N/A	N/A	0	N/A	0
	Subtotal		***154***		***12***
Escondido Canyon Park					

Table 3.15-2
Weekend Plan Trip Generation - Modified Redesign Alternative

Land Use	Size	ADT		Peak Hour	
		Rate	Trips	Rate	Trips
Campsites	0 campsites	2.0	0	0.15	0
Day-Use Area [c]	0 spaces	5.3	0	0.36	0
Subtotal			***0***		***0***
Latigo Trailhead					
Campsites	0 campsites	2.0	0	0.15	0
Day-Use Area [c]	4 spaces	5.3	21	0.36	1
Subtotal			***21***		***1***
Corral Canyon Park					
Campsites	17 campsites	2.0	34	0.15	3
Day-Use Area [c]	2 spaces	5.3	11	0.36	1
Subtotal			***45***		***4***
Conservancy's Malibu Bluffs Property					
Campsites	35 campsites	2.0	70	0.15	6
Day-Use Area [c]	5 spaces [d]	5.3	27	0.36	1
Subtotal			***97***		***7***
TOTAL			**317**		**24**
Proposed Project			**511**		**36**
Net Change			**-194**		**-12**

Source: ATE, 2010
[a] Currently there are 12 parking spaces in the dirt lots on Kanan Dume Road. The project proposes to develop 14 parking spaces at Kanan for a net increase of 2 spaces. The analysis assumes no credit for the existing spaces as a worst-case scenario.
[b] Future traffic for Ramirez Canyon Park based on total allowable trips (40 inbound and 40 outbound trips for a total of 80 ADT).
[c] Park Use trips include trips associated with park visitors, campground hosts and park employees, busses, refuse pick-up, etc.
[d] Four spaces in overflow area used by camp hosts and employees. Assumes worst case day use rate.

The Modified Redesign Alternative would result in 148 fewer weekday trips and 194 fewer weekend day trips compared to the Proposed Plan. Based upon analysis contained within the Draft EIR, the Modified Redesign Alternative would contribute less vehicle traffic on surrounding roadways than the Proposed Plan, it would not increase the V/C ratios at the key study-area intersections by 1% or 2% during the weekday or weekend peak hour period, and thus would not generate significant Alternative-specific or cumulative impacts based on the thresholds adopted by the City of Malibu and the County of Los Angeles. Potential impacts to intersection operation during weekdays and weekends would be *less than significant.*

Parking Analysis

Table 3.15-3 summarizes identifies the parking supply and demand for each of the park sites for this alternative.

Table 3.15-3
Ramirez Canyon Park Parking Summary - Modified Redesign Project Alternative

Land Use	Size	Peak Parking Demand	Spaces Provided	*Surplus*
Ramirez Canyon Park				
Park Operations-Phase 1	N/A	40 spaces	54 spaces	***+14 spaces***
Park Operations-Phase 2	N/A	40 spaces	48 spaces	***+8 spaces***
Latigo Trailhead				
Campsites	0 sites	0 spaces	4 spaces	***+ 4 spaces***
Corral Canyon Park				
Campsites	17 sites	18 spaces*	18 spaces	***0 spaces***
Day-Use	16 spaces	15 spaces**	16 spaces	***+ 1 space***
Malibu Bluffs Conservancy Property				
Campsites	35 sites	38 spaces***	40 spaces	***+2 spaces***
TOTAL (Phase 2)		**111 spaces**	**126 spaces**	***+ 15 spaces***

Source: ATE, 2010
* Assumes 1 space per campsite plus 1 space for campground hosts and/or other park employees.
** Summer Weekend parking demand observed at the site, including restaurant patrons using Corral Canyon Park parking spaces.
*** Assumes 1 space per campsite plus 3 spaces for campground hosts and/or other park employees.

Ramirez Canyon Park. Table 3.15-3 summarizes the parking data for Ramirez Canyon Park. Since vehicular operations at Ramirez Canyon Park are limited to 40 round trips per day, the maximum number of occupied parking spaces at Ramirez Canyon Park is forecast at 40 spaces. The 48 proposed parking spaces provided at the site would satisfy the 40-space parking demand. It is noted that 14 additional spaces would be provided along Kanan Dume Road under the Modified Redesign Alternative. These additional spaces would be allocated to day-use visitors to the park.

Escondido Canyon Park. This alternative does not include any new day-use, campsites, or parking at Escondido Canyon Park. Improvements within the park would be limited to expansion of the existing network of trails; no new parking demand would be anticipated.

Latigo Trailhead. Table 3.15-3 summarizes the parking data for Latigo Trailhead. This alternative does not include any campsites at Latigo Trailhead, but includes 4 new parking spaces. The 4 new parking spaces would be allocated to day use at this park site.

Corral Canyon Park. Table 3.15-3 summarizes the parking data for Corral Canyon Park. This alternative includes 17 campgrounds and a net increase of 19 parking spaces (34 total future spaces). The future parking supply would satisfy the demands for the proposed camp sites as well as accommodate the parking demands associated with the existing day use and site uses.

Malibu Bluffs Conservancy Property. Table 3.15-3 summarizes the parking data for the Malibu Bluffs Conservancy Property. This alternative includes 35 camp sites and 40 new parking spaces. The 40 proposed parking spaces provided at the site would satisfy the 38-space parking demand. The two (2) additional spaces would be allocated to day-use visitors to the park.

As demonstrated above, the Modified Redesign Alternative would result in a Plan-wide surplus of parking spaces and would not have a parking deficit at any individual park; no mitigation would be required. Potential parking impacts associated with development at Ramirez Canyon Park, Escondido Canyon Park (trails), Latigo Trailhead, and Corral Canyon Park would be *less than significant.*

Mitigation Measures

The Proposed Plan had required **MM TP-3** (Corral Canon Park Parking Management Plan) to address potential parking deficits at Corral Canyon Park during peak demand periods. As the Modified Redesign Alternative would have no traffic impacts and would not have a demonstrated parking deficit, including at Corral Canyon Park, no mitigation measures would be required, including **MM TP-3.**

Residual Impacts

Impacts would remain ***less than significant (Class III)***.

Analysis of Impacts Post-Mitigation

The general discussion of transportation and parking impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.15.3 Cumulative Impacts

The general discussion of cumulative transportation and parking impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.15.4 Comparative Analysis

Overall parking impacts associated with the Modified Redesign Alternative would decrease when compared to impacts anticipated under the Proposed Plan. The Modified Redesign Alternative would involve a decrease in average daily weekday travel trips by 35% and weekend average daily travel trips by 20%. The overall impact level of the Modified Redesign Alternative on transportation and parking would be considered less than significant (*Class III),* in contrast the Class III traffic and Class II parking determination for the Proposed Plan. ***Therefore, impacts on transportation and parking would result in a lesser degree of impact when compared to the Proposed Plan.***

3.16 Utilities and Service Systems

3.16.1 Setting

The setting for this alternative section would not differ from that identified with Section 5.16, *Utilities and Service Systems*, contained within the Draft EIR.

3.16.2 Impacts Analysis

Methodology and Thresholds of Significance

The Methodology and Thresholds of Significance for this alternative section would be similar to that identified with Section 5.14, *Utilities and Service Systems*, contained within the Draft EIR.

Project Impacts

Proposed improvements under the Modified Redesign Alternative would be quite similar to the Proposed Plan, with some notable reductions in campsites and parking spaces within certain park properties. The total number of campsites would be reduced from 71 to 54 campsites, while parking spaces would be reduced from 202 spaces to 157 spaces. The reduced number of proposed camping sites and parking spaces, as compared to the Proposed Plan would tend to decrease the intensity level of park activity. This would result in reduced energy and water use, as well as a reduction in solid waste generation from fewer people visiting the parks. Storm water drainage would be reduced from a decrease in impervious services associated with fewer parking spaces, and wastewater generation would be less due to fewer people expected at the parks. Associated impacts would be considered *less than significant*.

However, in contrast to the Proposed Plan, the Modified Redesign Alternative includes Park Administration/Employee Quarters, an additional fire truck/equipment storage shed, and non-open flame camp area cook stations. Electricity would be installed at these locations for the use of lighting (except no lighting at campsites), charging of equipment, and electrical hotplates and/or griddles for cooking. The increased demand for energy consumption associated with the increase in electrical hook-ups under this alternative would be minimal. Southern California Edison has indicated that additional demand within the Plan area could be accommodated with existing circuits and sub-stations and construction of new energy facilities would not be required. Impacts, therefore, to energy consumption would be considered *less than significant.*

Impacts related to an expanded use of the on-site wastewater treatment system at Ramirez Canyon Park would remain similar to that of the Proposed Plan and would continue to be considered *potentially significant*.

Mitigation Measures

Similar to the Proposed Plan, **MM US-3** (On-site Waste Water Treatment System Permitting) would be required, while **MM US-6.1, MM US-6.2**, and **MM US-6.3** (Solid Waste Reduction/ Recycling) would continue to be recommended.

MM US-3: To address LARWQCB Waste Discharge Requirements, MRCA staff shall prepare and submit the required waste discharge requirement form(s) to LARWQCB for review and approval.

Plan Requirement and Timing: MRCA shall submit the required waste discharge form(s) to LARWQCB for review and approval prior to construction activity.

Monitoring: Prior to construction activity at Ramirez Canyon Park, LARWQCB staff shall review and approve the waste discharge requirement form(s) for the Ramirez Canyon Park wastewater system(s).

MM US-6.1: To address construction & demolition (C&D) solid waste impacts, a C&D Waste Reduction Recycling Plan (WRRP) should be prepared to ensure that C&D materials (e.g., asphalt, concrete, and green waste) are recycled and/or reused to the maximum extent feasible, in order to divert a minimum of 50% of the C&D debris from disposal at the local landfill.

Plan Requirement and Timing: The project contractor(s) should submit a WRRP to MRCA for review and approval prior to construction activity.

Monitoring: Prior to construction activity, MRCA staff should review and approve the WWRP. During C&D efforts and prior to project sign-off, MRCA staff should verify implementation of the WWRP.

MM US-6.2: To address operational solid waste impacts, MRCA should develop and implement a Trash & Recycling Program at each park area. The trash/recycling program should identify the location and type of each non-recyclable and recyclable container, the frequency and method of trash/recycling pick-up at each park, and include signage to encourage park visitors to dispose of their trash properly.

Plan Requirement and Timing: A Trash & Recycling Program (TRP) should be prepared by MRCA and integrated into the final project construction plans prior to construction activity. Implementation of the TRP should be an on-going obligation of the project.

Monitoring: Prior to construction activity, MRCA staff should review and approve the TRP. During C&D efforts and prior to project sign-off, MRCA staff should verify implementation of applicable portions of the TRP. During operation of the project, MRCA management should spot-check that implementation of the TRP is being done faithfully and should adjust the plan as necessary to ensure continued solid waste diversion success.

MM US-6.3: MRCA should implement a greenwaste recycling program at each park. The Greenwaste Recycling Program should require that greenwaste be recycled onsite, whenever feasible. Park staff should cut and mince greenwaste and leave in place as part of routine park and trail maintenance.

Plan Requirement and Timing: A Greenwaste Recycling Program (GRP) should be prepared by MRCA and integrated into the final project construction plans, as applicable, prior to construction activity. Implementation of the GRP should be an on-going obligation of the project.

Monitoring: Prior to construction activity, MRCA staff should review and approve the GRP. During C&D efforts and prior to project sign-off, MRCA staff should verify implementation of applicable portions of the GRP. During operation of the project, MRCA management should spot-check that implementation of the

GRP is being done faithfully and should adjust the plan as necessary to achieve to ensure continued solid waste diversion success.

Residual Impacts

With implementation of **MM-US-3**, **MM US-6.1, MM US-6.2**, and **MM US-6.3** impacts would be considered ***less than significant (Class II)***.

Analysis of Impacts Post-Mitigation

The general discussion of utilities and service systems impacts related to implementation of all required mitigation for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.16.3 Cumulative Impacts

The general discussion of cumulative utilities and service systems impacts for the Proposed Plan (as identified in the Draft EIR) would also be applicable to the Modified Redesign Alternative.

3.16.4 Comparative Analysis

The overall impact level of the Modified Redesign Project Alternative on utilities and service systems would be considered *potentially significant, but mitigable* (*Class II)* (similar to the Proposed Plan), although to a somewhat reduced degree as a result in the decrease in park and recreation facilities proposed within the Plan area. ***Therefore, impacts on utilities and service systems would be slightly decreased in comparison to the Proposed Plan.***